CONTINUED FROM THE FRONT				
VII. SIC CODES (4-digit, in order of priority)			All States and Marie States	NEW CONTRACTOR EST
A. FIRST			ä, SECOND	
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VIII. OPERATOR INFORMATION				
	A. NAME			B. Is the name listed in
8 BORDEN INC				Item VIII-A size the
	wantener of the second		. 1	DYES - NO
19 36	**************************************			32 86
C. STATUS OF OPERATOR (Enter the app	ropriate letter Into the answ	er box; if "Osher", speci	(y.) D. P.	HONE (area code & no.)
S = STATE O = OTHER (specify)	federal or state) P	specifyj	6 1	4 2 2 5 4 0 0 0
P = PRIVATE	38	Private		18 2 2 3 4 0 0 0
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B C O L U M B U S		ОН 4 3	2 1 5 Is the facility	located on Indian lands?
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		89 81 41 47	- 31	:
X. EXISTING ENVIRONMENTAL PERMITS				
A. NPDES (Discharges to Surface Water)	D. PSD (Air Emission	s from Propose ! Sources		
9 N	9 P		'	
B. UIC (Underground Injection of Fluids)	13 13 11 11		33	30-1
C) T 1	E. OTHE	A (specify)		
910	9 M I S C		(specify) State Peri	
C. RCRA (Hazardous Wastes)			state Peri	N1 CS
CI+III	CIT III	R (specify)	1 (55)	
9 R O H D O O 4 2 9 4 3 5 1	9	·	(specify)	
XI. MAP DESCRIPTION OF THE PROPERTY.	Was many constitutions of the contract of the		10	
Attach to this application a topographic may				
Attach to this application a topographic may the outline of the facility, the location of e	aca of its existing and c	troposed intake and d	icom sear etclingues as	ما ما الما الما الما الما الما الما الم
ti datinent, storage, or disposal facilities, and	i each well where it inje	icts fluids undergroup	id. Include all springs.	rivers and other surface
water bodies in the map area, see mstruction	s tot buscize tednitement	e 		
XII. NATURE OF BUSINESS (provide a brief descri	otioni 📜		A PROPERTY OF THE PARTY OF THE	
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XIII. CERTIFICATION (see Instructions)				
I certify under penalty of law that I have pe	rsonally examined and a	m familiar with the in	formation submitted i	in this application and ail
attachments and that, based on my inquiry application, I believe that the information is	' Of those persons imm	ediately responsible t	or obtaining the infor	mation contained in the
false information, including the possibility of	fine and imprisonment.	ipiete, i dili dvydie (lie	at there are significant	t penalties for submitting
JAMES C. WEAVER	V8. 510 MAT	URE .	B	C. DATE SIGNED
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Α.	FI							Y 15	ee in	struc	tion.	and for below	defi							у.	mma)pag		2.NEW FACILITY (Complete item below.) FOR NEW FACILITIES.
8	PROVIDE THE DATE OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left) PROVIDE THE DATE OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)																						
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	A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).																						
	 PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process. AMOUNT — Enter the amount. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used. 																						
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<u>(† </u>				<u> </u>	<u>D</u> L	P				7 / A						' /	\		/ '			' /	
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- Solvent recovery is a two stage operation. In the first stage, Line #1 solvent is removed from scrap ink. In the second stage, water introduced by the first operation is removed from the solvent.
- Plating discharge treated to precipitate chrome and copper which Line #2 is then removed in throw away filters.

- IV. DESCRIPTION OF HAZARDOUS WASTES A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Suppart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	KILOGRAMS	
TONS	METRIC TONS	

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

- 1. PROCESS CODES:
 - For listed hazardous weste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item !!! to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Nota: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste,

In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

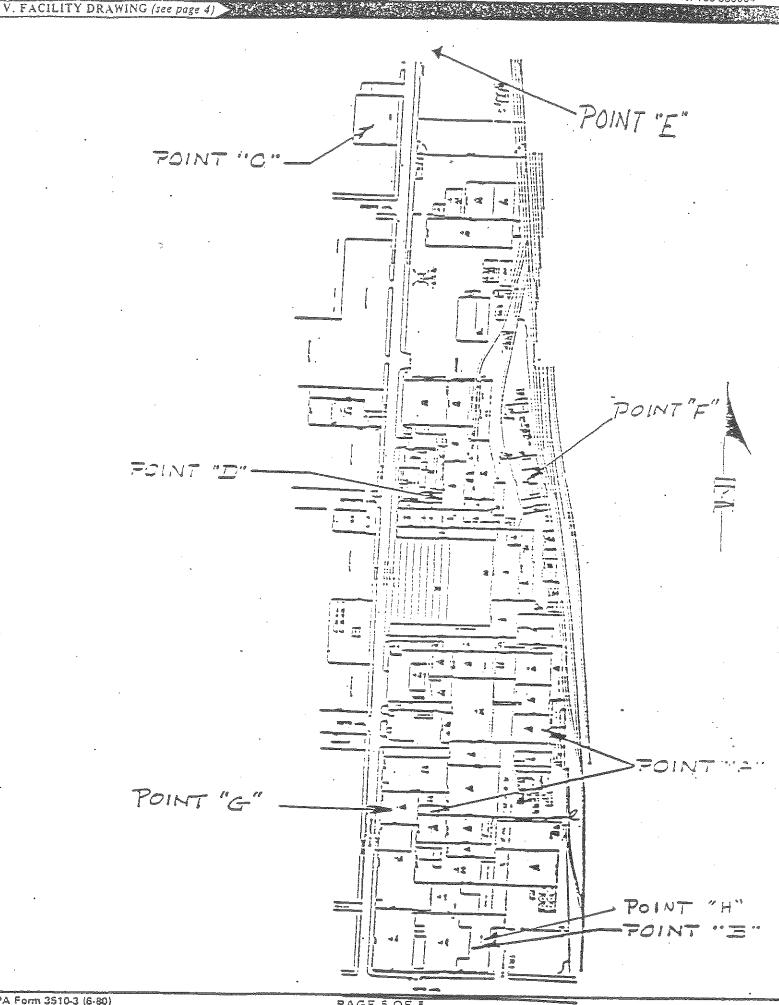
EXAMPLE FOR COMPLETING ITEM IV Ishown in line numbers X-1, X-2, X-3, and X-4 below! — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

u	A. EPA HAZARD.				70 60 700 8 A B 800 600 600 A B B B B B B B B B B B B B B B B B B	C. UNIT	D. PROCESSES							
HAZA ZO WASTI JZ (enter o		E	10	B. ESTIMATED ANNUAL QUANTITY OF WASTE	SURE (enter code;	1. PROCESS CODES 2. PROCESS DESCRIPT (enter) (if a code is not entered in	ION D(1))							
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X-2	D	0	0	2	400	P	T 0 3 D 8 0	and the state of t						
X-3	D	0	0	1	100	P	T 0 3 D 3 0	Qualitaritating maillean of the interest of th						
X4	D	0	0	2			included with abo	1.6						

EPA I.O. NUMBER (enter from page 1)						/		FOR OFFICIAL USE ONLY							
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NO.	W			QUANTITY OF WASTE	OF St (e.	UNIT MEA- JRE nler ode)	Married and Application and Applications		ter)	5	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
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V. DESCRIPTION OF HAZARDOUS WASTES (co	ntinued) STA		şükkəniləşi.		
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OHDO0429435176					
/. FACILITY DRAWING				And the second	
All existing facilities must include in the space provided on	page 5 a scale crawing o	of the facility (see instru	ctions to more	g detail.	
/I. PHOTOGRAPHS DEPENDENT AND		7-32-2002-8-A-C			
All existing facilities must include photographs <i>(aer</i> treatment and disposal areas; and sites of future sto	rial or ground-level)	that clearly delineate	all existing st	tructures; existing	storage,
reatment and disposal areas; and sites of future sto	rage, treatment or un	Sposal areas face made		May Established	
LATITUDE (degrees, minutes, & second.		LONG			v)
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JAMES C. WEAVER VIII. FACILITY OWNER 3 9 5 9 0 2 3 3 9 6 9 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	listed in Section VIII on listed in Section VIII on LITY'S LEGAL OWNE	Form 1, "General Info Form 1, complete the A. CITY OR TOWN Amiliar with the informally responsible for obtaining the presence of the presenc	o 8 2 5	2. PHONE NO 2. PHONE NO 3. S. ST. 6. C. DATE SIGNED //-20-	to the left and . farea code & no.; ZIP CODE Jactached eve that the formation,
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PA Form 3510-3 (6-80)



EPA Form 3510-3 (6-80)

PAGE 5 OF 5

PART B APPLICATION

(a) General Information Requirements

(1) A General Description of the Facility

This section provides a general description of the Columbus Coated Fabrics Company and, most specifically, the Hazardous Waste Storage Building within the property lines of the company. This description is intended to acquaint the permit application reviewer/permit writer with an overview of the facility. More complete details can be found in other parts of this permit application.

(I) General Description

Columbus Coated Fabrics Company is located within the city limits of Columbus, Ohio, approximately two miles north of the center of the city. The street address is:

Columbus Coated Fabrics 1280 North Grant Avenue Franklin Avenue Columbus, Ohio 43201

(II) The mailing address is:

Columbus Coated Fabrics P. O. Box 208 Columbus, Ohio 43216 (III) This facility is primarily a manufacturer of decorative vinyl products. Hazardous wastes are generated as described in the Waste Analysis Plan.

Wastes are stored in containers on a concrete pad, inside a building. Refer to "Specific Information", Section 21, for further details.

The contact and party responsible for the hazardous waste management activities at Columbus Coated Fabrics is:

Grover Thomas Environmental Supervisor 614-297-6097

(19) Topographic Map and Other Required Maps

Figure #1 is a map showing the 100 year floodplain area and surface waters. Figure #2 is a topographic map showing the facility boundaries, buildings, waste storage building, surrounding land use and other details. Figure #3 is a Wind Rose. Figure #4 is a facility map showing property lines, buildings, roadways and other details. Figure #5 is a plan view of the hazardous waste storage building. Figure #6 is a section view of the hazardous waste storage building.

The scale on all maps is 1 inch equals 200 ft. except on the 100 year floodplain map. Also, the topographic map with contour lines is at an interval of 10 ft.

The contour interval was discussed with K. Homer at Region V EPA, the permit application reviewed, and the EPA considered the submission of the map with the 10 ft. contour intervals to be acceptable since the ground area in the area of the facility is quite level.

(i) Map Scale and Date

Figures 1 through 6 all contain scale and/or date as applicable.

(ii) 100 Year Floodplain

Figure #1 is the U.S. Department of Housing and Urban Development Flood Hazard Boundary Map.

A discussion with Region V EPA resulted in the approval for the submission of this scale of 1 inch equals 1,000 ft. The floodplain as shown substantially coincides with the map presently being drafted at the State of Ohio Department of Natural Resources of the 100 year floodplain areas.

(iii) <u>Surface Waters</u>

The surface waters are shown on the 100 year floodplain map (Figure #1).

(iv) <u>Surrounding Land Uses</u>

The surrounding land uses are shown on Figure #2.

(v) Wind Rose

Figure #3 shows an annual Wind Rose of meteorological data collected for the year 1975 at the weather station #14821 at Port Columbus International Airport 5.3 miles east of the Columbus Coated Fabrics facility in Columbus, Ohio.

(vi) Map Orientation

Figures #1 through #6 all contain map orientation.

(vii) <u>Legal Boundaries</u>

Figure #2 indicates the legal boundaries of the facility.

(viii) Access Control

Figure #4 shows the fences surrounding the facility including Gate #5 which is the gate at which the hazardous waste leaves the facility.

The entire facility is surrounded by a cyclone fence with security barbed wire. Guard houses are situated at all the entrances to the plant. Employees must show identification to obtain access; visitors must sign in and out and wear a visitor's badge. Access control is discussed in further detail in Section (4) "Security Requirements".

(ix) Inspection and Withdrawal Wells

The site has no injection wells.

There are three withdrawal wells in the facility (shown in Figure #2) of which only two are active at the present time. The three are located in the Boiler House, adjacent to the north exterior wall of the Lab building and the PC-4 Calender building.

The withdrawal wells at the exterior wall of the Lab building and the PC-4 Calender building are the only active wells at present. This water is used only for non-contact cooling.

(x) <u>Buildings: Treatment, Storage or Disposal Operations; or</u> <u>Other Structures</u>

Figure #4 shows the building and structures on the property as well as the Hazardous Waste storage building.

Recreation Areas: Not applicable.

Access and Internal Roads: Figure #4 shows the roads within the plant area and the one road leading into the hazardous waste storage building.

#4. The sewer system within and without the plant facility are separated into storm and sanitary sewers. All internal plant drainage (domestic and process sewage) drains to the sanitary sewers. The roof drains are mostly piped directly to the city storm sewer system. Some roof drains are included with ground water drainage from the facility to the storm sewers on Grant Avenue and 5th Avenue.

There are no process sewers at this facility.

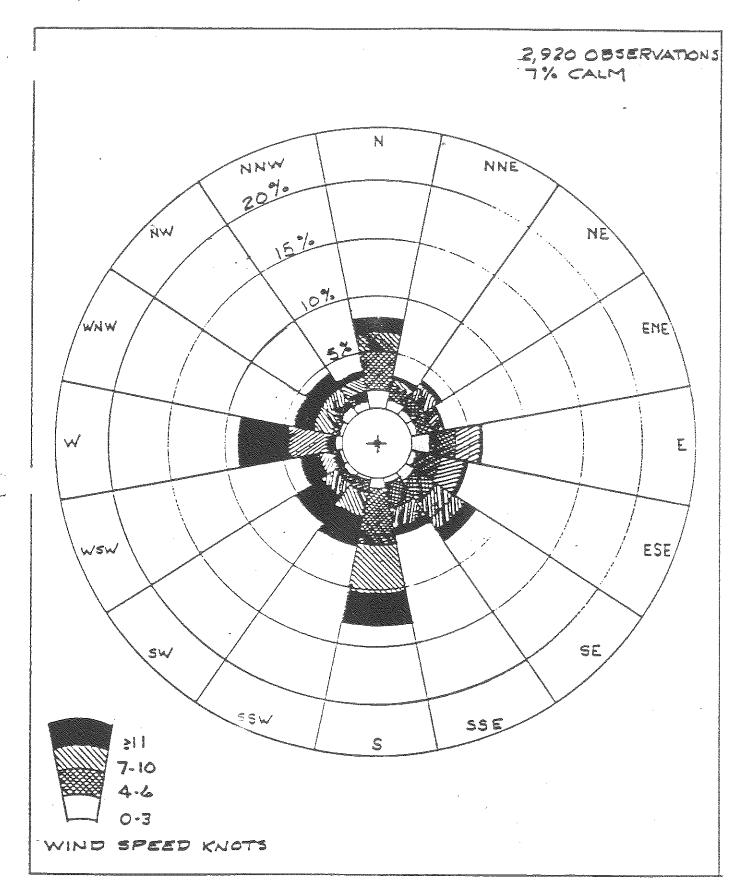
The loading and unloading area is shown in Figure #4 and further described in Section (10) "Traffic Patterns".

Fire Control facilities are described on pp. 38 and 39 of the Emergency Action Plan.

Surface Waters: The only surface waters are the Olentangy River approximately 1.1 miles west of the facility, and Alum Creek approximately 2.3 miles east of the facility. These waters are shown on Figure #1.

General drainage in the property is toward Grant Avenue and 5th Avenue. The facility is not within any 100 year floodplain area. There is no run on at the storage building since the building is enclosed and roofed with at least a 4 inch curb at exits and entrances.

The Hazardous Waste Storage Building is located and shown in Figures #2 and #4.



DATE: 1982

COLUMBUS COATED FABRICS PERMITS Sorted by EPA # -01 25 04 0031-

EPA ≝	COMPANY ID	DESCRIPTION -	ISSUED	COMMENTS*
B001	Boiler #1(62 MMBTU Derate)	Coal Fired Boiler	08/06/86	
1002	Boiler #1(62 MMBTU Derate)	Coal Fired Boiler	08/06/86	
B003	Boiler - 7.5 MMBTU Gas/Oil	ماري رسي مرين بالها الله الهام الهام الهام الهام منه الهام ا	11/17/78	
	Boiler - 7.5 MMBTU Gas/Oil		10/18/85	
	HL-40	Gravure Printer	11/02/83	1
	DN-14	NBC Line	11/02/83	
	DF-41 w/Incinerator	Roll Coater	11/02/83	7
	FY-10	Inlay Embosser	11/02/83	7
	FY-12	Inlay Embosser	11/02/83	7
	HS-32 w/Incinerator	Gravure Printer	11/02/83	1
	HS-33 w/Incinerator	Gravure Printer	11/02/83	1
	DP-21, DL-21	Laminator	11/02/83	<u> </u>
K015	HI-41	Gravure Printer	11/02/83	
KO16	HF-4	Gravure Printer		<u>+</u>
	HF-12	Gravure Printer	05/21/85	2
	HM-30	Gravure Printer	05/21/85	2
	HM-31	Gravure Printer	05/21/85	4
	HM-35		05/21/85	1 1 1 1 1 2 2 2 2 2 2 2 2 2 2 2
	HM-36	Gravure Printer	05/21/85	۵
	HM-37	Gravure Printer	05/21/85	4
	HM-38	Gravure Printer	05/21/85	2
_		Gravure Printer	05/21/85	2
	HM-39	Gravure Printer	05/21/85	2
	Silk Screening	Design Lab Unit	10/29/82	
	PC-5 Calender/Laminator	Plastic Calendering	10/29/82	
	DL-24	Laminator	04/11/86	
KO31	DL-25	Adhesive Laminator/ Reverse Roll	04/11/86	
K032	DL-26	Adhesive Laminator/ Reverse Roll	04/11/86	
K034	DR-24	Plastic Coater	04/11/06	
		(Vinyl)	04/11/86	
K035		Flocker	04/11/86	
		(Vinyl-Adhesive/Ink)		
K036	SA-19	Paper, Cloth and	04/18/86	
77 0 0 0	3 12 4	Vinyl Coating Machine		-
K037	BN-4	Fabric Coating Line	04/11/86	•
P010	U-135 Mixer w/Baghouse	Moorehouse-Cowles	09/25/81	3
P012	U-137 Mixer w/Baghouse	Mixer Moorehouse-Cowles	10/02/81	4
	war samsawa 11 jawagsawawa	Mixer	± 0/ 0 2/ 0 ±	
POl3	U-138 Mixer w/Baghouse	Moorehouse-Cowles	10/02/81	4
POl4	U-139 Mixer w/Baghouse	Mixer Moorehouse-Cowles	10/09/81	4
		Mixer		

^{1 -} Variance Issued/USEPA must approve
2 - Modified Variance/USEPA must approve

^{3 -} CCF applied 5/23/84 - need update 4 - CCF applied 6/19/84 - need update

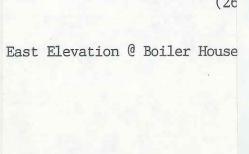
COLUMBUS COATED FABRICS PERMITS (cont.) Sorted by EPA # -01 25 04 0031-

	EPA #	E	EPA #	COMPANY ID	<u>DESCRIPTION</u>	ISSUED	COMMENTS * *
PO15 PC-2 Plastic Calender PO16 PC-3 Plastic Calender PO17 PC-4 Plastic Calender PO18 PC-6 Plastic Calender PO23 CP-2,21,22,23,24 & 29 Plating PO39 FR-11, Embossing PO40 FL-17, Embossing PO41 FL-18, Embossing PO42 FL-01, Embossing PO43 FL-11, Embossing PO44 FL-13, Embossing PO45 FL-14, Embossing PO46 FL-15, Embossing PO47 FL-15, Embossing PO49 FR-12,	P015 P016 P017 P018 P023 P039 P040 P041 P042 P043 P0445 P046 P049		P015 P016 P017 P018 P023 P039 P040 P041 P042 P043 P045 P046 P049	PC-2 Plastic Calender PC-3 Plastic Calender PC-4 Plastic Calender PC-6 Plastic Calender CP-2,21,22,23,24 & 29 Plating FR-11, Embossing FL-17, Embossing FL-18, Embossing FL-11, Embossing FL-11, Embossing FL-11, Embossing FL-12, Embossing FL-13, Embossing FL-14, Embossing FL-15, Embossing FR-12, Embossing	Plastic Calendering Plastic Calendering Plastic Calendering Plastic Calendering Plating Tanks Embossing Machine	10/09/81 10/20/81 10/20/81 10/30/81 12/18/81 06/24/83 06/24/83 06/24/83 06/24/83 06/24/83 06/24/83 06/24/83 07/08/83 07/08/83	4 4 4

^{* 1 -} Variance Issued/USEPA must approve 2 - Modified Variance/USEPA must approve 3 - CCF applied 5/23/84 - need update 4 - CCF applied 6/19/84 - need update



West Elevation
Plating North Side





27)
Boil

Facility East Elevation
BETWEEN
Boiler House&Main Plant

(28

Facility East Elevation FACING
South @ Main Plant





Facility East Elevation Hazardous Waste Storage

29)

Facility South Elev.

Loading Dock

for

Hazardous Waste





1) Hazardous Storage Bldg. East Wall

Hazardous Storage Bldg.
North Wall





Hazardous Storage Bldg. Facing East @ Entrance Hazardous Storage Bldg.

West Elevation Entrance



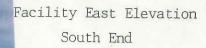


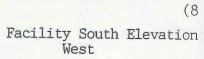
Hazardous Storage Bldg. West Elevation, North of Entrance

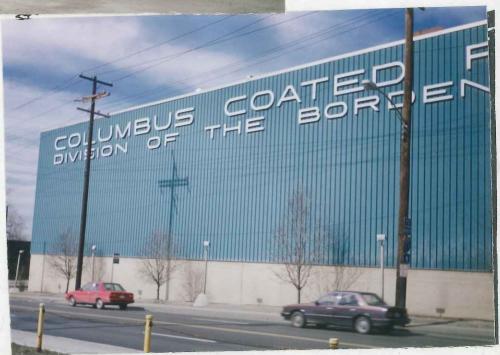
Facility East Elevation
South End





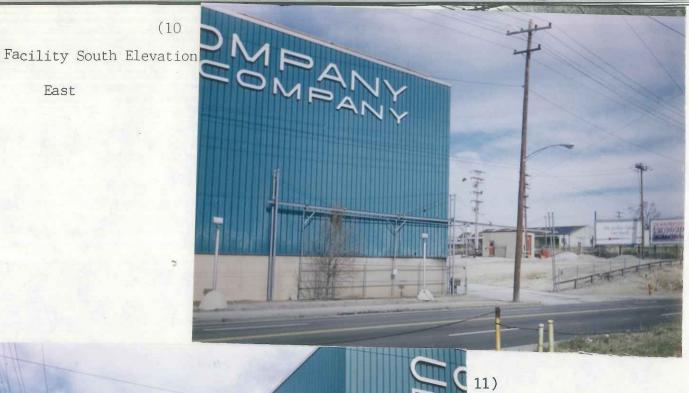








Facility South Elevation
South



S

Facility West Elevation,
South West Corner

Facility West Elevation

Gate 22, 6th & Front





Facility West elevation
Facing North @ 6th&Grant



Facility West Elevation at 7th Avenue





15)

Facility West Elevation

(16

Facility West Elevation

Business Office





17)

Facility West Elevation

Employee Entrance

Facility West Elevation

Ship&Receive Entrance





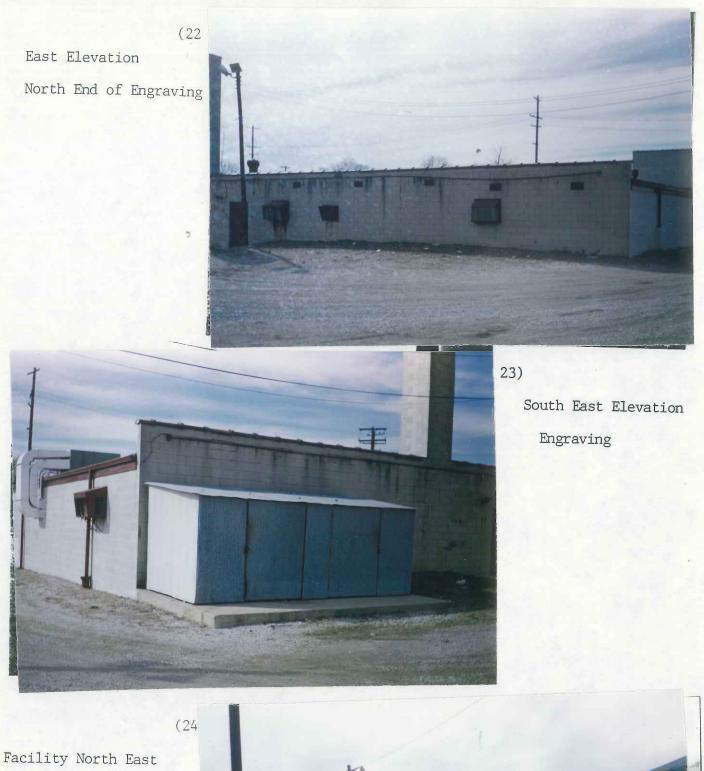
North East Elevation
Plating Bldg.

Facility West Elevation
Facing North @ South of 9thAve





North West Elevation
Engraving



Facility North East Elevation



- (2) Hazardous Waste Analyses OAC 3745-54-13 (A)
 Following are independent laboratory analyses of the Columbus
 Coated Fabrics Hazardous Wastes starting on page 3 of this section.
- (I) Pan Wash Tank Waste
- (a) This is described in laboratory analyses, pages 14 through 20 of this section.
- (b) This waste is generated at the two (2) pan wash rooms located as point "A" on map page 2B of this section. At these locations, ink pans are cleaned with solvent. Periodically, the used solvent is removed and disposed of.
- (c) The basis for the hazard designation is TCLP and Ignitability. (D006 and D001)
 - (1) TCLP exceeds the maximum allowable lead and cadmium concentration.
- (II) Dust Stop Oil and Plasticizer Residue
- (a) This is described in laboratory analyses on pages 12 and 13 of this section.
- (b) This oil and residue is generated at the dust stops of the Banbury mixers located as point "B" on map page 2B of this section. The seals on the mixers get contaminated with plasticizer. The contaminated seals constitute this waste.
 - (c) The basis for the hazard designation is TCLP. (D006)
 - (1) TCLP exceeds the maximum allowable cadmium concentration.

(III) DN-14 - Solid and Liquid

- (a) This is described in laboratory analyses on pages 3 through 8 of this section.
- (b) This waste is a process waste generated at the DN-14 Coding Machine located as point "D" on map page 2B of this section.
- (c) The basis for the hazard designation is ignitability. (D001)
- (IV) Used Hydrochloric Acid. In other areas of this document Hydrochloric Acid may be referred to as Muriatic Acid.
- (a) This is described in laboratory analyses on page 11 of this section.
- (b) This waste is generated in the cleaning of the boiler water softening system located as point "F" on map page 2B of this section.
- (c) The basis for the hazard designation of this waste is Corrosivity. (D002)

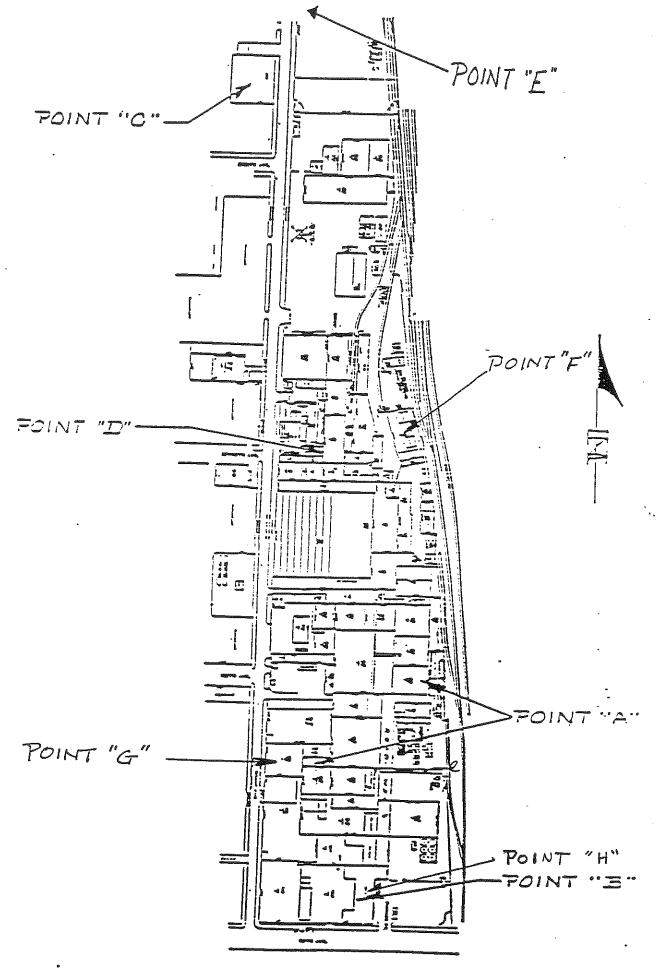
(V) Waste Ink

- (a) This is described in laboratory analyses on pages 9 through 10A of this section.
- (b) This waste is generated from printing processes located as Point "G" on map page 2B of this section.
- (c) This waste is ignitable (D001) and may exceed TCLP limits.

- (d) Occasionally, small amounts of waste cyclohexanone for cleaning is added to this waste.
 - (e) This waste is a listed waste F003 and F005.

(VI) Filter Bags

- (a) This is described in laboratory analyses on page 11B of this section.
- (b) This waste is generated from the filtration of process materials through filter bags and the subsequent disposal of these bags. This process is located as point "H" on map page 2B of this section.
- (c) The basis for the hazard designation of this waste is TCLP (Barium and Cadmium), D005 and D006.



AFPROX. SCALE: 1-210'-C



C_ABORATORY RESULT

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SAMPLE NO.	90-0582
	30-3362
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DATE OF REPORT	
	09-18-1990
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CLIENT INFORMATION SEE

Cols. Coated Fabrics P.O. Box 208 Columbus, OH 43216 William Hg COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

DN-14 Liquid Urethane CCF #643

ANALYSIS -	数 RESULTS	PEUNITS P	
			METHOD SEEDED
Landfill Ban Constituents-TCLP			
		·	
• .			
Carpon Terrachieride			
Chicananana	< 0.005	mg/!	SH-846 / 3240
Chlorotorm	< 0.005	mg/!	SU-346 / 8240
c-Cresci I	< 0.005	mg/!	\$H-646 / 8240
	< G.25	mg∕!	SH-346 / 3270
2-3-950 (< 0.25	mg/l	SW-846 / 8270
Crase!	< 0.25	≡g/i	SH-646 / 8270
·	< 0.25	mg/i	SH-646 / 8270
Wetnyl Etnyl Kerone	3.31	me / i	M11 74 M A M
		mg/!	\$%-846 / 824C
%1 ************************************	< 0.05	mg/i	Ti-346 / 9270
Pyridine	< 0.25	mg/l	52-346 / 8270
Tetrach lorsethy lene	< 0.1	mg/1	Sv-346 / 8270
		mil s	S4-346 / 824C
50. •	:	ļ	·
Trichtorcethylene	< 0.3	mg/I	S*-346 / 8240
	1		
Arsenie .			
Ber i m	< 0.001	mg/l	SY-846 / 7061
Cadalum	0.001	mg/l	S4-846 / 7CS1
.Circalum Total	0.048	. Bg/1	5¥-&16
resq [52]	< 0.001	mg/1	S¥-246 / 7191
ye.cal. read	0.028	mg/l	5¥-346 / 7421
Selenium	0.004	mg/i ·	S¥-346 / 7471
Silver ::.	0.001	mg/l	54-346 / 7740 /-200
Senzene	. 0.202	Bg/1	SY-846 / 7761
- Contane	< 0.005	mg/1	SW-346 / 8240
	.< 0.03	Bg/1	54-346 / 8080



LABORATORY RESULT

SAMPLE NO.

90-0582

DATE RECEIVED 08-14-1990

DATE OF REPORT 09-18-1990

PAGE

2

CLIENT INFORMATION

Cols. Coated Fabrics

COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

DN-14 Liquid Urethane CCF #643

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	ANALYSIS ESTA	RESULTS	SUNITS	METHOD
			<u> </u>	
	1,4Dichlorobenzene	< 0.05	mg/i	SW-846 / 8270
•	1,2-Dichloroethane	< 0.005	mg/1	SW-246 / 8Z40
	1,1-3ichlorosthylene	< 0.005	mg/1	SH-316 / 8210
	2, Cinitrotaluene	< 0.03	mg/!	SW-846 / 8270
	and in	< 0.02	mg/l	S1-346 / 8080
	Restachion (and its hymoxide)	< 0.003	mg/l	\$%-346 / 8080
	rexach crosenzene	< 0.05	mg/1	SW-346 / 6270
	hexachiche-1, j-sutadiene	< 0.05	mg/l	5%-245 / 8270
	dexach (croethane	< 0.05	mg/l	\$%-346 / 8270
<u></u>	Lincane	< 0.4	⊞g/l	SW-345 / 8080
~	Netroxychier	<10.0	mg/1	SH-646 / 8080
	Pentach lorophenol	< 0,25	mg/l	SW-846 / SZTO
	Toxachene	< 0.5	mg/1	SW-846 / 8080
	2, ÷, 5=Trichichteronenol	< 0.25	mg/1	3%-346 / 627g
	2,-,5-7.ica:cropmenc(< 0.25	mg/i	SH-646 / 8270
	2,-,;-;= (3:1vex)	< 1.00	mg/i	SH-346 / 8080
	Viny! Chloride	< 0.01	mg/l	Si-646 / 8240
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COLUMBUS 0HIO 43215 PHONE - 614-228-4385

BURDEN INC.-COLS. COATED FABRICS 1250 N. GRANT AVE. COLUMBUS, ONTO 43201 ATTRE HR. WILLIAM ILG

140 %5, 2034 Jii FAIII DATE Hay 24, 1988

LOCATION COLLECTED BORDEN CCF DR. 929 NO.377 - DN-14 Liquid

···· PRESERVATIVES USED

DATE CULLECTED - - - Harch 16, 1988

Time collectes - - -

DATE RECEIVED - - - Harch 24, 1968

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ISAITABILITY	54.0	F
EP TOXICITY-Old	COMPLETE	
ARSERIC-EZ	<0.125	HG/KG
BARIUK-EP	(5.0	#3!XG
CADMIUH-EP	₹0.25	NG/KG
CHROHIUH-EF	1.23	MG/KG
LEAT-EP	2.75	H5/K6
HERCURY-EP	₹0.05	HG/KG
SELENIUH-EF	40.125	#6/KG
SILVER-EF	<i>{0.50</i>	MG/KG
3GLVEH7S	3 <i>0</i>	FERCENT

PROJECT HANAGER WILSON), WALKER



LABORATORY RESULT

SAMPLE NO.

90-0583

DATE RECEIVED

08-14-1990

DATE OF REPORT

09-18-1990

PAGE

1 of 2

ECLIENT INFORMATION 等

Cois. Coated Fabrics P.O. Box 208 Columbus, OH 43216 William IIg COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

DN-14 Solid Urethans CCF #644

	AND DESCRIPTION OF THE PARTY OF			
-3-2-2	ANALYSIS SEEDING	RESULTS	EXUNITS	METHOD
ĺ	Landfill Ban Constituents-TCL?			
ĺ				
•	_			
	Carbon Terrachionice	< 0.005	mg/!	SH-646 / 6240
	Chichopenzene	< 0.005	mg/i	SH-846 / 824Q
	Chloreform	< 0.005	mg/[\$%-346 / 8240
	C-3-esc!	< 0.25	mg/l	SN-346 / 82TO
	≒ -7-350 .	< 0.25	#g/1	S1-846 / 82TO
_	l czerze	< 0.25	mg/l	51-346 / 3270
(Cresci	< 0.25	ag∕1	S4-846 / 8270
				v•
	·			
	the constant of the constant o			
	Methyl Sthyl Katone	0.062	mg/1	S:1-246 / E240
	::: crobenzens	İ		
	Pyriding	< 0.05	ng/i	3: 646 / 8270
	Terrachicroethylene	< 0.25	mg/l	Si-346 / 8270
		< 0.1	mg/l	S%-346 / 8Z4Q
	•		Ĺ	
		j		<u>-</u>
	Trichlorcathylene	< 0.5		- '
		« U.5	mg/I	Si-346 / 6240
		1		
	J			
	Arsenic	< 0.001	mg/1	(to) M L P D State on
	Barius .	0.001	mg/i	S1-346 / 7061 . S1-346 / 7081
•	Ceća i un	0.053	eg/i	SW-846 / 7131
	Ctrosius Total	. < 0.001	mg/i	S¥-846 / 7191
	Laed .	0.192	Bg/1	SW-246 / 7421
	Hercury	0.003	Bg/I	SV-346 / 7471
	Seienium ·	0.001		SV-346 / 7740 FEE
	Silver	0.001		·Si-346 ./ 7761
ALTERNATIVE STREET	Benzane	· : < 0.003	*g/1	5¥-346 /8240
	Colordane	< 0.03	eg/i	Su-346 /8080.
	2,43	<:0.0		27-34E \ 2020



LABORATORY RESULT

SAMPLE NO.

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SECLIENT INFORMATION 35

Cols. Coated Fabrics

COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

DN-14 Solid Urethane CCF #644

文字 Table ANALYSIS 言語 图象 图象 图象 图象 图象 图象 图象 图象 图象 图象 图象 图象 图象	RESULTS	業UNITS 写	METHOD
1,4-Dichlorobenzene 1,2-Dichloroethane 1,1-Dichloroethylene 2,4-Dinitrotoluene Endrin Heotochtor (and its hyroxide) Hexachlorobenzene Hexachloroethane Lindane Methoxychlor Pentachlorophenol Toxachene 2,4,5-Trichlorophenol 2,-,5-Trichlorophenol 2,-,5-Tr (Silvex) Vinyl Chloride	< 0.05 < 0.005 < 0.05 < 0.02 < 0.05 < 0.05 < 0.05 < 0.27 < 0.27 < 0.27 < 0.25 < 0.25 < 0.25 < 0.25 < 0.25	mg/1 mg/1 mg/1 mg/1 mg/1 mg/1 mg/1 mg/1	SW-246 / 8270 SW-246 / 8240 SW-246 / 8270 SW-346 / 8080 SW-346 / 8080 SW-346 / 8270 SW-346 / 8270 SW-346 / 8270 SW-346 / 8080 SW-346 / 8080
•			

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STILSON LABORATORIES, INC. 170 NORTH HIGH STREET COLUMBUS OHIO, 43215 FHONS - 614-228-4385

BORDEN INC.-COLS. COATED FABRICS 1280 N. GRANT AVE. COLUMBUS, OHIO 43201 ATTN: NR.WILLIAH ILS

LAB NO. 2035 JUB 903335 DATE Hay 26, 1988

LOCATION COLLECTED BURDEN CCF NO.378 - DN-14 Solid

· ·---Preservatives used

DATE COLLECTED - - - Harch 16. 1988

TIME COLLECTED - - - C

DATE RECEIVED - - - march 24, 1988

Test	Result	じねませ
ISHITABILITY	214.0	jus jus
EP- TOXICITY	COMPLETE	
ARSEAIC-EP	<i><0.005</i>	HG/L
BARIUH-EF	<1.0	HG/L
Cadalun-sa	(0.0:	MG:L
CARONIUH-E?	<0.05	#G/L
	0.27	#3/L
HERCURY-EP	.0.0005	#Ĝ/ L
SELENTUH-EF	(0.005	#3/L
SILVER-EP	(0.05	HG/L
PH START	7.65	SU
FH END	*. 2	Së
SOLVENTS	Š	FERCENT

PROJECT MANAGER __



__ABORATORY RESUL

SAMPLE NO.

90-0571

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PAGE

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CLIENT INFORMATION TO SEE

Cols. Coated Fabrics P.O. Box 208 Columbus, OH 43216 William IIg

COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

Waste Solvent Ink (Blue)

CC: \$640

THE STATE OF THE S			
ANALYSIS	RESULTS	EUNITS	METHOD SEE
Landfill Ban Constituents-TCL3			
Carbon Tatrachloride			
Chiorobensene	< 0.005	mg/1	SW-846 / 824G
Chloroform	< 0.005	mg/1	SH-346 / 8240
C-1795Ci	< 0.005	mg/:	SH-346 / 8240
ದ್ವಾರ್ಡಿತ್ವದ (< 0.25	mg/1	SW-346 / S2TO
2-0:esq!	< 0.25	mg/1	SN-846 / 8270
Cresci	< 0.25	mg/1	S%-845 / 8270
	< 0.25	mg/[S%-846 / 8270
Methyl Ethyl Katone	0.30	mg/l	511-646 / 6 246
Methyl Isobutyl Ketone	1960.0	mg/l	SW-846 / 8240
::::::::::::::::::::::::::::::::::::::	< 0.05	mg/!	\$\infty = 346 \ / 8270
Pyridine	< 0.25	mg/i	Si-246 / 8270
Terrachicrosthylene	< 0.1	mg/l	S%-346 / 8240
•			
Tricalcreethylene			
and the state of t	< 0.5	mg/i	SH-846 / 8240
Arsenic	***	8	
Sarium .	0.023	mg/l	S'2-346 / 7061 -
Cacta lum	0.68	mg/i	Si-346 / 7081 ·
Circalus Total	0.054	mg/l	S¥-846 / 7131
Lesd :	0.212	mg/l	SY-246 / 7191
	2.15	mg/l	EPA 600 / 236
Mercury Selentus	0.002	mg/l .	54-846 / 7471
Silver	0.002	Eg/1	S'4-346 / 7740 / 270
	0.004	Bg/l	54-346 / 7761
- Benzene	< 0.005	ag/i	s¥-346 /:8240
Z,4-D	< 0.03	8g/1	SK-346 / 8080
	<10.0	8g/1	s¥-346 1/3080 ·



LABORATORY RESULT

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90-0571

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09-18-1990

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IENT INFORMATION BEST

Cols. Coated Fabrics

COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

Waste Solvent Ink (Blue) CCF #640

ANALYSIS TO THE PARTY OF THE PA	RESULTS	**UNITS	STEERS METUOD
I,Dichloroethane 1, 2-Olchloroethylene 2, 4-Jinitrotoluene Endrin Reptschior (and its hyroxide) Rexachioroethane Vexachioroethane Vexachioroethane Vincane Vincane Ventoxychlor Pentschiorophenol Toxochene 2, 4, 5-Trichlorophenol	RESULTS < 0.05 < 0.005 < 0.005 < 0.02 < 0.03 < 0.05 < 0.05 < 0.05 < 0.05 < 0.5 < 0.5 < 0.5 < 0.5 < 0.25 < 0.25 < 0.25 < 0.25 < 0.25 < 0.05	mg/l mg/l mg/l mg/l mg/l mg/l mg/l mg/l	SW-346 / 8270 SW-346 / 8240 SW-346 / 8240 SW-346 / 8270 SW-346 / 8080 SW-346 / 8080 SW-346 / 8270 SW-346 / 8270 SW-346 / 8270 SW-346 / 8080 SW-346 / 8080
		•	

9-190-9-15-90

Laboratory Menagar



CP§

RCP, INC. 2246 S. HAMILTON ROAD P.O. BOX 32454 COLUMBUS, OHIO 43232 (614) 864-6123

LABORATORY RESULTS

SAMPLE NO.

90-0847

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CLIENT INFORMATION

Cols. Coated Fabrics P.O. Box 208 Columbus, OH 43216 William Hig COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

Waste Solvent Ink

ANALYSIS	RESULTS	Sa UNITS	METHOD	
Cyclohexanone	< 0.02	mg/I	SW-846 / 8270	Vancania
	<u> </u>			
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	1 20 5 6 8 8			
	A CHILDREN			
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
		T T T T T T T T T T T T T T T T T T T		
		-		

Respectfully

Laboratory Manager



LABORATORY RESULTS

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90-0789

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CLIENT INFORMATION

Cols. Coated Fabrics P.O. Box 208 Columbus, OH 43216 William Ilg

COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

Spent Muriatic Acid CCF \$655 (10/05/90)

ANALYSIS	RESULTS	UNITS	METHOD
рН	0.2	s.u.	EPA 600 / 150
ignitability (flash point)	>190	Deg. F.	SW-346 / 1010
			SW-846 / 1110
Cyanide Reactivity	0.002	mg/I	SW-346 / 9010
	:		
Metals (TCLP)	•		
Arsenic	0.592	mg/1	SW-846 / 7061
Barium	0.05	mg/1	SW-846 / 7081
Cadmium	0.010	mg/1	SW-846 / 7131
Chromium Total	0.08	mg/!	SW-346 / 7191
Lead Mercury	0.08	mg/i	SW-846 / 7421
Selenium	0.001	mg/1	SW-346 / 7471
Silver	0.002	mg/!	SW-346 / 7740
31176	0.001	mg/l	SW-346 / 7761
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Respectfully

STILSON LABORATORIES, INC. 170 WORTH HIGH STREET COLUMBUS OHIO 43215 PHONE - 614-228-4385

BORDEN INC.-COLS. COATED FABRICS 1280 N. GRANT AVE. COLUMBUS, OHIO ATTN: HR.WILLIAM ILG

LAB NO. 1405 JOB 903335 DATE June 1, 1987

LOCATION COLLECTED BORDEN CCF 223 FILTER BAGS

PRESERVATIVES USED

DATE COLLECTED - - - April 9, 1987

TIME COLLECTED - - - O

DATE RECEIVED - - - April 10, 1987

•		
Test	Result	Unit
PH, LAB	6.55	SU
IGHITABILITY	HO FLASH	ognition John B
EP- TOXICITY	COMPLETE	
ARSENIC-EP	<0.005	MG/L
BARIUN-EP	589.0	MGIL
CADHIUH-EP	360.0	HG/L
CHROHIUM-EP .	₹0.05	MG/L
LEAD-EP	0.15	HG/L-
HERCURY-EP	<0.0005	MG/L
SELEXIUH-EP	(0.005	HG/L
SILVER-EP	(0.05	HG/L
PH START	6.11	SU·
PH END	5.03	SU

PROJECT	Hanager	شه المنافع المنافع الله الله الله الله الله الله الله الل
		HILSON T. HALKER

STILSON LABORATORIES, INC. 170 NORTH HIGH STREET COLUMBUS OHIO 43215 PHONE - 614-228-4385

BORDEN INC.-COLS. COATED FABRICS 1280 N. GRANT AVE. COLUMBUS, OHIO ATTN: HR.WILLIAM ILG

LAB NO. 1404 JOB 903335 DATE Hay 19, 1987

LOCATION COLLECTED BORDEN CCF 222 FILTER BAGS

PRESERVATIVES USED

DATE COLLECTED - - - April 9, 1987

TIME COLLECTED - - - O

DATE RECEIVED - - - April 10, 1987

Test	Result	Unit
PH, LAB	4.75	SU
IGHITABILITY)150.0	F
EP- TOXICITY	COMPLETE	
ARSENIC-EP	<0.005	MG/L
BARIUN-EP	446.0 STD AD	HG/L
CADMIUM-EP	350.0	HG/L
CHRONIUN-EP	<0.05	MG/L
LEAD-EP	<0.05	<i>HGJL</i>
HERCURY-EP	<0.0005	HG/L
SELEHIUH-EP	<0.005	HG/L
SILVER-EP	<0.05	HG/L
PH START	4.28	SU
PH END	4.53	SU

PROJECT	HANAGER	•
		WILSON T. WALKER



__ABORATORY RESULT

SAMPLE NO. 90-0569

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SCLIENT INFORMATION

Cois. Coated Fabrics F.O. Box 208 Columbus, OH 43216 William Hg

COMPANY NO.

DATE RECEIVED

101

08-10-1990

SAMPLE IDENTIFICATION/DESCRIPTION

FC4 Dust, Stop Oil (Liquid) CCF #633; Col. 8/8/90

			- Ofen and the second s	
	ANALYSIS	RESULTS	EUNITS	METHOD
	Landfill Ban Constituents-TCLP			I SHE THOUSE THOUSE THE THOUSE TH
	Carson Terrachionide			
	Chicrosenzene	< 0.005	ਕਫੁ∕ੀ	S%-345 / 8240
	Chieratem	< 0.005	mg/1	SW-845 / 8240
	;-3:95G	< 0.005	mg/l	S%-846 / 8240
	7-7-330	< 0.25	ag/l	S%-846 / 8270
,	3-3-3901	< 0.25 < 0.25	mg/f	S%-346 / 8270
(Cresol	< 0.25	mg/1	SH-346 / 8270
<u>`</u> =		تسوال ال	mg/l	S%-846 / 6270
	İ	ĺ		
	Metnyl Ethyl Kerone	İ		
	. S/ C.nyl Xefons	< 0.005	mg/l	SH-846 / 824C
	Nicoenzene			•
	Pyridine	< 0.05 < 0.25	mg/i	SH-346 / 3270
	Terraca I creethy lene	< 0.23	mg/l	S:4-346 / 8270 ·
	•	7 001	mg/l	Si-346 / 8240
			•	•
	Trichlorosthylene	< 0.5	mg/l	Si-346 / 8210
		1	_	
	·			
	Arsenic	0.044		
	Bar I yaa	0.011 3.595	mg/!	SY-246 / 7061
	Cecius	1.2	eg/i eg/i	S=-846 / 7081
	Circulus Total	< 0.001.	Bg/l	SY-346 / 7131
	lron	< 0.001	Bg/I	5%-346 / 7191 EPA 600 / 236
	Vertury	< 0.0CZ	mg/1	SY-346 / 7471
	Se i en i um	0.001	Bg/1	SW-245 / 7740 =
١.,	Silver .	< 0.00₄	=g/1	SY-346 / 7761
	Benzana : , , .	· < 0.005	eg/1	5 4-3 46 / 8240 ·
ĭ	Colordana	< 0.03	2g/1	S¥-346 / 8080
	2 1-3	<10.0	52/1	<u> </u>



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90-0569

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CLIENT INFORMATION >

Cols. Coated Fabrics

COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

PC+ Dust, stop Oil (Liquid) CCF #638; Col. 8/8/90

 ANALYSIS 3	RESULTS	NOTE NOTE NOTE NOTE NOTE NOTE NOTE NOTE 	METHOD
1,4-Dichlorobenzene 1,2-Dichlorobenzene 1,1-Dichlorobenylene 2,4-Dinitroboluene Endrin Hebrachlor (and its hyroxide) Hexagniorobenzene Hexagniorobenzene Hexagniorobenzene Hexagniorobenzene Lindane Methoxychlor Pentagniorobenol Toxagnene 2,4,5-Trichlorobenol 2,4,5-Trichlorobenol 2,4,5-Trichlorobenol 2,4,5-Trichlorobenol 3,4,5-Trichlorobenol 3,4	< 0.05 < 0.05 < 0.05 < 0.05 < 0.05 < 0.05 < 0.05 < 0.05 < 0.05 < 0.25 < 0.25 < 0.25 < 0.25 < 0.05	mg/1 mg/1 mg/1 mg/1 mg/1 mg/1 mg/1 mg/1	SW-846 / 8240 SW-846 / 8240 SW-846 / 8270 SW-846 / 8080 SW-846 / 8080 SW-846 / 8270 SW-846 / 8270 SW-846 / 8080 SW-846 / 8270 SW-846 / 8080 SW-846 / 8270 SW-846 / 8270 SW-846 / 8240

CPS 8-1-90-8-17-90

9-1-90-9-15-90

Respectfully Lacoratory Manager



_ABORATORY RESULT

SAMPLE NO.

90-0567

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CLIENT INFORMATION SERVICE

Cols. Coated Fabrics P.O. Box 208 Columbus, OH 43216 William Hg

COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

Pan Wash Sludge, 2 Phases, CCF #636, Col. 8/9/90

ANADYOLO					
ANALYSIS	RESULTS	運UNITS	5 🚉	METHC	D
Lancfill Ban Constituents-TCLP					
		-		_	
				•	
Cartem Tetrachlorice		1	1		
Chicrobenzene	< 0.005	mg/!		SW-246 / 8240	
Gierafam	< 0.005	mg/!		SN-845 / 8240	
<u> </u>	< 0.005 < 0.25	mg/i	Ì	SW-846 / 8240	
	< 0.25	==/1	İ	Si-546 / 8270	
(< 0.25	mg/l	1	SW-845 / 8278	
Cassi	< 0.25	mg/l	-	SH-346 / 8270	•
_	7 4043	mg√!	ļ	SW-846 / 8270	
	ł				
Nerthy: Ethy! Kerone	9.667	mg/!		SW-346 / 3240	
%[trosenzene					
Pyridine	< 0.05	.mg/l		5%-246 / 8270	
	< 0.25	mg/i		Si-346 / 8270	
Terrach longerhy lene	< 0.1	mg/1		54-346 / 8240	
	- :				- •
Tricalcrestaylene	< 0.5				
·	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	mg/i]	S:-246 / 8240	
			Ĭ		
		÷			
Arsenic	0.006	eg/i		SW-346 / 7061	
Barius	0.294	mg/1		S-246 / 7081	•
Cachium	. 0.063	≡g/l		5¥-346 / 7131	
Chrosius Total	. 0.110	mg/1		51-246 / 7191	
	8.03	mg/1		S'-346 / 7421	
Mercury Selenium	0.003	mg/i		54-846 / 7471	
Silver	0.001	mg/1		54-346 / 7740	
Benzene ·	0.005	Bg/l		SY-846 / 7761	
- Chlordane		ag/i		SH-346 / 824C .	•
2,43	< 0.03 < 0.03	mg/I		SE-346 / 8C80	
	<u> </u>	ma/1	1	etzic / enen	



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Cols. Coated Fabrics

COMPANY NO. 101

SAMPLE IDENTIFICATION/DESCRIPTION

Fan Wash Sludge, 2 Phases, CCF #636, Col. 8/9/90

ANIAL VOIC CONTRACTOR			
ANALYSIS ANALYSIS	RESULTS	NUNITS 至	METHOD
1,4-3ichlorobenzene	< 0.05	ng/l	
1,2-Dichiorcethane	< 0.005	mg/i	S#-346 / 8270
1,:-Dichlorcethy[ene	< 0.005	mg/!	SW-246 / 8240
2.i-linitrotoluene	< 0.05		SH-346 / 8240
Engrin	< 0.02	mg/1	SW-845 / 8270
Peotecnicr (and its hyroxide)	< 0.003	mg/1	SH-346 / 8030
riexaca lorquentene	< 0.05	mg/l	S14-345 / S050
Hexach(ond-1,3-butad(ene	< 0.05	mg/l mg/l	SW-346 / S270
Hexechi ordethane	< 0.05	mg/1	SV-346 / 5270
- Lincane	< 0.4		SN-845 / 8270
Yethoxyen(er	<:0.0	mg/l	SW-845 / 8080
Fentach (orapheno)	< 0.25	mg/!	SW-246 / 8080
Cxaonene	< 0.5	mg/	\$4-846 / 8270
4,4,5-Trichlorophenol	,	mg/!	32-346 / 308Q
2, 3, 3-77 ion longsheno i	< 0.25	mg/I	SN-646 / 8270
2,-,3-77 (31(yex)	< 0.05	mg/1	SN-846 / 8270
Vinyl Chiorice	< 1.00	ag/I	3%-646 / 8030
	< 0.01	ag/1	SW-646 / 8240
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9-1-90-8-17-90

Rescertully

Laboratory Manager



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CLIENT INFORMATION 3

Cols. Coated Fabrics P.O. Box 208 Columbus, CH 43216 William Hg

COMPANY NO.

101

SAMPLE IDENTIFICATION/DESCRIPTION

Pan Wash Solids; CCF ≸637 Collected 3/9/90

ANALYSIS SEATE	表写る RESULTS	MUNITS S	WAR THE THE THE TANK THE THE TANK THE THE THE THE THE THE THE THE THE THE
Lancfill Ban Constituents-TCL3		1	METHOD
Carton Tetrachloride			
Chioresenzane	Costs 5	ಷ್ವ/1	S%-3-6 / 624C
	< 0.005	mg/i	SH-346 / 8240
G=1:230	< 0.007	mg/!	SU-845 / 8240
7-2-9-0	< 0.25	mg/l	SH-346 / 3270
;-::-:::::::::::::::::::::::::::::::::	< 0.25	mg/I	SH-846 / 8270
Gresci	< 0.25	ជាថ្វ/ ែ	SX-246 / 8270
-	< 0.25	mg/!	SW-645 / 8270
Methyl Ethyl Kerone	4.35	mg/1	S:i-246 / 3240
Al Trobenzane	< G.C5	/ 8	
Pyridine	< 0.25	mg/i	Sx-346 / 8270
Terrach creathy ene	< 0.1	mg/1	SH-346 / 8270
	1 401	mg/!	S=-346 / 8240
•]		f
•	,	•	1
Trichicrosthylene	< 0.5		m. 2.4
		mg/l	S#-346 / 8240
•	· ·		
Arsenic	- 0.015	ag/1	S14-346 / 7061
Sarius	0.592	peg√l	S%-845 / 7C81 · · · ·
Caci lua	0.173	æg/1	SY-346 / 7131
Circalus Total	0.190	mg/l	S¥-846 · / 7191
Lead	8.025	. mg/l	EPA 600 / 236
Hereury	0.003	pg/1 '	Si-346 / 7471
Solenium	0.001	mg/1	S¥-346 / 7740 / 270
Silver	0.005	84 /1	52-346 / 7761
. Benzene · ·	< 0.005	eg/i	54-345 / 8240
Colordane	. < 0.03	sq/i	S¥-346 / 8080
2.40	. <10.0	mg/i	54-346 / 8080



LABORATORY RESULT

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CLIENT INFORMATION 2

Cols. Coated Fabrics

COMPANY NO. 101

SAMPLE IDENTIFICATION DESCRIPTION

Pan Wash Solids; CCF #637 Collected 8/9/90

ANALYSIS	RESULTS	EUNITS	METHOD
1,4-Dichloropenzene 1,2-Dichloropenzene 1,1-Dichloropenylene 2,4-Dinitrotoluene Endrin Hebrachlor (and its hyroxide) Hexachloropenzene Fexachloropenzene Fexachloropenane Lincane Methoxychlor Fentachlorophenol Toxonene 2,4,5-Trichlorophenol	<pre></pre>	mg/I mg/I mg/I mg/I mg/I mg/I mg/I mg/I	SY-846 / 8270 SY-846 / 8240 SY-846 / 8240 SY-846 / 8270 SY-846 / 8080 SY-846 / 8080 SY-846 / 8270 SY-846 / 8270 SY-846 / 8270 SY-846 / 8080 SY-846 / 8270 SY-846 / 8270
	•	teriminative de la companya de la co	* ***

Q-1-90-8-17-90

Respectful Laboratory Manager

STILSON LABORATORIES. INC. 170 WORTH HIGH STREET COLUMBUS OHIO 43215 PHONE - 614-228-4385

BORDEN INC .- COLS. COATED FABRICS 1280 H. GRANT AVE. COLUMBUS. OHIO 43201 ATTH: HR. WILLIAM ILG

LAB NO. 1374 J08 903335 DATE Harch 16. 1988

LOCATION COLLECTED CCF PAN ROOM SAMPLE FROM DRUM CCF#368

PRESERVATIVES USED

PAN WASH TANK WASTE

DATE COLLECTED - - - February 24. 1988

TIME COLLECTED - - - O

DATE RECEIVED - - - February 24. 1988

	والمناقلة والمنا	
Test	Result	
PH. LAB	V&2614	Unit
9 8 11 6 6 6 6 6 6	3.57	SU
IGNITABILITY	S4.0	F
TCLP-HETALS		r
ARSENIC-TCLP	COMPLETE	
	(0.005	HG/L
BARIUH-TCLP	. 1.36	52 / ° / 1
CADMIUM-TCLP		HG/L
CHRONIUN-TCLP	0.08	#G/L
Wasse	0.49	. HG/L
LEAD-TCLP		
HERCURY-TCLP		HG/L
SELEHIUM-TCLP	0.0009	HG/L
	(0.005	HG/L
SILVER-TCLP	⟨0.05	\$4 P\$ 11 1
VOLATILES-TCLP		HG/L
	COMPLETE	HG/L

PROJECT MANAGER

CCF VOLATILES TCLP PAN WASH TANK WASTE 368

SLI# 1374

COMPOUND	
ACRYLONITRILE BENZENE	CONC MG/1
	<0.01
CARBON DISULFIDE	<0.01
CARBON TETRACHLORIDE	<0.01
CHLOROBENZENE	<0.01
. CHLOROFORM .	
1,2-DICHLOROETHANE	<0.01
1,1-DICHLOROETHENE	<0.01
I SOBUTANOL	<0.01
	<0.01
METHYL ETHYL KETONE	<0.01
NITROBENZENE	36.00
1,1,1,2-TETRACHLORDETHANE	< 0.01
- 1-1-1-2-1ETRACHLOROFTHENE	
TETRACHLORDETHENE	<0.01
TOLUENE	<0.01
	<0.01
1,1,1-TRICHLORGETHANE	<0.01
1,1,2-TRICHLORGETHANE	<0.01
TRICHLOPDETHENE	<0.01
UINYL CHLORIDE	<0.01
	<0.01

STILSON LABORATORIES, INC. 170 HORTH HIGH STREET COLUMBUS OHIO 43215 PHONE - 614-228-4385

BORDEN INC .- COLS. COATED FABRICS 1280 H. GRANT AVE. COLUMBUS, OHIO ATTN: HR.WILLIAH ILG

LAB NO. 6743 JOB 903335 DATE January 16, 1987

LOCATION COLLECTED BORDEN CCF181 SLUDGE FROM WASH TANKS

PRESERVATIVES USED

DATE COLLECTED - - - - - - - - - - - - - 1986

TIME COLLECTED - - - 0

DATE RECEIVED - - - October 17, 1986

₹ 0 00000000000000000000000000000000000	Result	Unit
IGHIT ABILITY	FLASH @ 73	F
EP- TOXICITY	COMPLETE	•
ARSENIC-EP	0.022	HG/L
BARIUN-EP	54,53	HG/L
CADHIUH-EP	5.50	14G / L
CHROMIUM—EP	0.08	MG/L
LEAD-EP	1.93	MG/L
HERCURY-EP	0.00057	MG/L
SELENIUH-EP	<i><0.005</i>	HG/L
SILVER-EP	0.04	HG/L
PH START	ర-దర	SU
PH END	5.2	SÜ

- (3) Waste Analysis Plan OAC 3745-54-13 (B)
- (I) A copy of the CCF Waste Analysis Plan is shown on page 12.
- (II) Table IA, page 14, shows Hazardous Waste Parameters and Rationale. TCLP and Ignitability will be tested annually for the listed hazardous wastes.
- (III) Sampling Methods are as follows:
- All Wastes are sampled by the sampling methods described in "Test Methods for Evaluating Solid Waste", Physical/Chemical Methods U.S. EPA SW-846 Second Edition. Equipment used for sampling is as described on the next pages.
- Dust Stop Wastes Solid Wastes Samples are taken from (6) random drums with a trier as shown on the next pages and on Table I. A composite is then sent in glass jars to an independent laboratory for analysis. No preservatives are required or used. Dust Stop Oil Liquid Wastes Samples are taken from (6) random drums with a Coliwasa as shown on the next pages and on Table I. A composite is then sent in glass jars to an independent laboratory for analysis. No preservatives are required or used.

A GRAB SAMPLE IS TAKEN FROM THE DRUM OF USED HYDROCHLORIC ACID AS DESCRIBED ABOVE. THE SAMPLE IS THEN SENT IN A GLASS JAR TO AN INDEPENDENT LABORATORY FOR ANALYSIS. NO PRESERVATIVES ARE REQUIRED OR USED.

(iv) Paint Filter Test

If required to DETERMINE IF A HAZARDOUS WASTE IS A SOLID OR LIQUID WASTE ACCORDING TO REGULATIONS, a paint filter test will be performed and a sample will be taken to an independent laboratory for analysis.

(V) Sample Log

A sample log is maintained stating type of sample taken, method used to obtain sample and the date it was sent to an independent laboratory for analysis.

Procedure

- 1. Clean trier.
- 2. Insert trier into waste material 0 to 45 from horizontal. Rotate trier to cut a core of the waste. Remove trier with concave side up and transfer sample.
- 1.2.1.6 Auger

Scope and Application

An auger consists of sharpened spiral blades attached to a hard metal central shaft. An auger samples hard or packed solid wastes or soil.

Apparatus

Augers are available at hardware and laboratory supply stores.

Procedures

- 1. Clean sampler.
- 2. Bore a hole through the middle of an aluminum pie pan large enough to allow the blade of the auger to pass through. The pan will be used to catch the sample brought to the surface by the auger.
- 3. Place pan against the sampling unit. Auger through the hole in the pan until the desired sampling depth is reached. Back off the auger and transfer the sample in the pan and adhering to the auger to a container. Spoon out the rest of the loosened sample with a sample trier.
- 1.2.1.7 Scoop and Shovel

Scope and Application

Scoops and shovels are used to sample granular or powdered material in bins, shallow containers and conveyor belts.

Apparatus

Scoops are available at laboratory supply houses. Flat-nosed shovels are available at hardware stores.

Procedures

- 1. Clean Coliwasa.
- 2. Adjust sampler's locking mechanism to ensure that the stopper provides a tight closure. Open sampler by placing stopper rod handle in the T-position and pushing the rod down until the handle sits against the sampler's locking block,
- 3. Slowly lower the sampler into the waste at a rate that permits the level of liquid inside and outside the sampler to remain the same. If the level of waste in the sampler tube is lower inside than outside, the sampling rate is too fast and will produce a nonrepresentative sample.
- 4. When the sampler hits the bottom of the waste container, push sampler tube down to close and lock the stopper by turning the Thandle until it is upright and one end rests on the locking block.
- 5. Withdraw Coliwasa from waste and wipe the outside with a disposable cloth or rag.
- 1.2.1.2 Weighted Bottle

Scope and Application

This sampler consists of a glass or plastic bottle, sinker, stopper, and a line which is used to lower, raise, and open the bottle. The weighted bottle samples liquids and free-flowing slurries.

General Comments and Precautions

- 1. Do not use a nonfluorocarbon plastic bottle to sample wastes containing organic materials.
- 2. Do not use a glass bottle to sample wastes that contain hydrofluoric acid.
- 3. Before sampling, ensure that the waste will not corrode the sinker, bottle holder, or line.

Apparatus

A weighted bottle with line is built to the specifications in ASTM Methods d 270 and E 300. Figure 2 shows the configuration of a weighted bottle sampler.

Procedure

- 1. Clean bottle.
- 2. Assemble weighted bottle sampler.
- 3. Lower the sampler to directed depth and pull out the bottle stopper by jerking the line.
- 4. Allow bottle to fill completely as evidenced by cessation of air bubbles.
- 5. Raise sampler, cap, and wipe off with a disposable cloth. The bottle can serve as a sample container.
- 1.2.1.3 Dipper

Scope and Application

The dipper consists of a glass or plastic beaker clamped to the end of a 2- or 3-piece telescoping aluminum or fiberglass pole which serves as the handle. A dipper samples liquids and free-flowing slurries.

General Comments and Precautions

- 1. Do not use a nonfluorocarbon plastic beaker to sample wastes containing organic materials.
- 2. Do not use a glass beaker to sample wastes of high pH or wastes that contain hydrofluoric acid.
- 3. Paint aluminum pole and clamp with a 2-part epoxy or other chemical resistant paint when sampling either alkaline or acidic wastes.

Apparatus

Dippers are not available commercially and must be fabricated to conform to specifications detailed in Figure 3. Table 3 lists the parts required to fabricate a dipper.

Procedures

- 1. Clean beaker, clamp, and handle.
- 2. Assemble dipper by bolting adjustable clamp to the pole. Place beaker in clamp and fasten shut.
- 3. Turn dipper so the mouth of the beaker faces down and insert into waste material. Turn beaker right side up when dipper is at desired depth. Allow beaker to fill completely as shown by the cessation of air bubbles.
- 4. Raise dipper and transfer sample to container.

DATE: May 6, 1983 REVISION NO.: 0





April 20, 1983

Borden, Inc. Columbus Coated Fabrics 1280 Grant Avenue Columbus, Ohio 43201

Attn: Mr. Bill Ilg

Dear Bill:

This letter is to inform you that all hazardous waste analyses have been performed in accordance with <u>SW-846</u>, <u>Test Methods for Evaluating Solid Wastes</u>, <u>Physical/Chemical Methods</u>.

Please call me at once if further information is required.

Sincerely,

STILSON LABORATORIES, INC.

Thomas A. Flippo

Biologist

TAF/1kd

WASTE ANALYSTS PLAN

All waste STORED AND shipped off site is determined by an inspection (consisting of a chemist and the hazardous waste coordinator) to be either possibly hazardous or definitely non-hazardous. The locations of the various waste streams were determined by interviews with all plant superintendents and determining all of the actual and possible waste dispositions from heir respective areas of the plant.

- 1. The non-hazardous wastes are those known to either not be composed of toxic chemicals or not to have been in contact with any toxic material.
 - eg. Wood Scrap Cardboard Scrap etc.
- 2. All other items are considered to be possibly hazardous. A typical representative sample is obtained from the area in which the waste is generated according to instructions from an independent laboratory and as described in Sections 2 and 3. This sample is sent to an independent laboratory for evaluation. An independent laboratory will evaluate the sample for the criteria required by RCRA TCLP, Corrosivity, and Ignitability according to the "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods", SW-846 (see letter page 5A). TCLP tests are not required on the FOO1 FOO5 waste streams since these waste streams will not be landfilled. Other analyses are

performed as appropriate to determine the constituents of a particular waste. Disposition of the waste is then handled according to the determinates of either being hazardous, non-hazardous, liquid or solid.

There are no incompatible wastes generated at this facility. Based on the facility's knowledge of the waste streams, it has been determined that no California List Wastes are being generated.

Possible new waste streams due to new and/or additional product developments are determined by the particular engineer involved with the project. Preliminary samples of the new waste stream are analyzed and after the decision is made as to the method of disposal, the final disposition is implemented by the hazardous waste coordinator.

If waste streams change, an analysis is made by an independent laboratory in order to determine the proper STORAGE AND disposal methods, eg. incineration, landfill.

COLUMBUS COATED FABRICS GENERATES WASTES SUBJECT TO LAND DISPOSAL RESTRICTIONS. THOSE WASTE STREAMS ARE KNOWN. CONFIRMING ANALY-SES ARE OBTAINED ANNUALLY TO VERIFY THAT CONCENTRATIONS ARE MET

WHICH MEET LAND BAN RESTRICTIONS. ANY TSDF FACILITY TO WHICH RE-STRICTED WASTES ARE SENT WILL BE NOTIFIED THAT THEY ARE RECEIVING LAND DISPOSAL RESTRICTED WASTES. COPIES OF THESE NOTIFICATIONS WILL BE KEPT WITH THE MANIFESTS. THESE RECORDS WILL BE MAIN-TAINED AT THE FACILITY FOR FIVE (5) YEARS FROM THE DATE THE WASTE WAS LAST SENT TO THE OFF SITE TSDF.

TABLE I

HAZARDOUS WASTE PARAMETERS AND RATIONALE

WASTE	SAMPLING METHOD	<u>PARAMETERS</u>	RATIONALE
DN-14 - Solid	Trier	Ignitability	This is an ignitable waste (D001). Past analyses have not identified any TCLP exceedences.
DN-14 - Liquid	Coliwasa	Ignitability	This is an ignitable waste (D001). Past analyses have not identified any TCLP exceedences.
Waste Filter Bags	Grab	TCLP	Analysis has identified Barium and Cadmium as exceed- ing the TCLP limits.
Waste Ink	Coliwasa; Grab	Ignitability; TCLP, F003 Cyclohexanone	Analysis has shown this material to be ignitable and to exceed TCLP limits in some cases.
Used Hydrochloric Acid	Coliwasa	Corrosivity and TCLP - Cr	Analysis has identified the pH to be below 2 S.U. and Chromium as exceeding TCLP limits.
Dust Stop Waste	Trier	TCLP - Cadmium	Past analyses have identified only Cadmium as exceeding TCLP limits (D006)
Pan Wash Tank Waste∻	Coliwasa	Ignitability; TCLP - Pb & Cd	This is a listed waste - F005 exhibiting ignitability and TCLP Pb & Cd.

* Pan Wash_Tank Waste

--Is generated at the two (2) pan wash rooms in the CCF facility. Waste is periodically removed from the bottom of the wash tanks and placed in type 17E Hazardous Waste Drums for removal to the Hazardous Waste Storage Building.

-- The waste is analyzed at least once per year. It is checked for the parameters of:

Ignitability pH TCLP

--This is a listed waste (F005) containing - prior to use - more than 10% by volume of MEK (Methyl Ethyl Ketone).

--CCF has not and will not - pursuant to regulations - landfill this F005 waste. A TCLP test is, therefore, not required. However, CCF has generated a TCLP analysis. Attached are copies of two (2) TCLP analysis.

TABLE II

ANALYTICAL TEST METHODS

PARAMETER	TEST METHOD
Ignitability	SW-846 / 1010
Corrosivity	SW-846 /
TCLP (Metals)	SW-846 / Extraction 7061, 7081, 7131, 7191, 7421, 7471, 7740, 7761
TCLP (Organics)	SW-846 / Extractions 8240, 8080, 8270
F002 Constituents	SW-846 / 8240
F003 Constituents	SW-846 / 8240
F005 Constituents	SW-846 / 8240/8270

(4) Security Requirements

(i) In addition to the 24-hour trained guard service explained below, there are the general security provisions of fencing, gates and other features.

The facility is reasonably well lit and well protected by the lighting and the perimeter fencing. The lighting is of sufficient quality to enable the TV monitoring cameras discussed below to be used on a 24-hour basis.

- (ii) The guard force is equipped with hand held two-way radios in order to provide instant reporting of problem conditions.
- (iii) A public address system is supplied for the entire facility and is audible inside and outside the plant buildings. A connection to the public address system is installed at the main guard house. All of the telephones throughout the facility are also connected to the PA system by dialing a double digit code number.
- (iv) An internal telephone system is maintained throughout the facility. A telephone is located in the hazardous waste storage building.
- (v) Employees enter and exit the facility only at the gate with a member of the guard force in attendance. Visitors and contractors entering the plant must sign in and out on a log sheet and also obtain a visitor's pass. See Figure 7.
- (vi) Security at the Columbus Coated Fabrics facility is maintained by a staff of trained outside security guards. A guard is stationed at all the active entrances and exits to the

- facility on a 24-hour basis. In addition, watchmen's key stations are maintained throughout the facility and are operated by roving guards between the hours of 6:00 p.m. and 6:00 a.m. Specifically, a watchman's key station is located immediately adjacent to the hazardous waste storage building.
- (VII) At the main guard house, remote controlled television cameras (total of 5) monitor the entire facility perimeter. A guard monitors these cameras on a 24-hour basis.
- (VIII) The gates not active for the entire 24 hours are closed, locked and monitored by the television camera. These gates can be remotely operated by guards at the main guard house if required.
- (IX) The perimeter of the entire facility is enclosed with a 7 foot high chain link fence with 3 strands of barbed wire on top.
- (X) Entry is controlled by means of guards on all the gates when the gates are active in order to permit the passage of either vehicles or personnel.
- (XI) Signs at all entrances to the facility state "NO SMOKING". Signs at the entrance to the hazardous waste storage building state "Danger Unauthorized Personnel Keep Out". In addition, signs are posted at all entries to the active portion of the facility and at intervals so that they are visible from all angles of approach. The signs measure approximately 10" x 14". The letters are 2.5" high. They are legible from a distance of at least 25 feet.

** O 1884 P-458-C 0124. REFERRED TO: License Mate ÷ 0 TIME OGT: COATED F ADDRESS: COLUMBUS firm name: VISITOR'S NAME: +35 twitter

(i) The foreman in charge of the hazardous waste storage area checks inside the hazardous waste storage building and the surrounding area. The foreman in charge of the loading dock area checks that specific area. These inspections are conducted as per the inspection schedule in Table II, pg. 3-4, with the frequency as indicated. This inspection schedule will be kept at the facility. Similar inspection procedures are conducted in Building 95, Satellite Storage Area.

Figure 8, pg. 5, is a daily inspection log providing a record of the inspector's specific observations as per the inspection schedule, Table II (pg. 3-4) and the remedial action taken, if required, including the date of such action.

Figure 8a, pg. 6, is a hazardous waste drum inventory sheet on which the inspector indicates the actual weekly inventory of the number and type of hazardous waste drums in storage.

- (a) General Inspection Requirements

 The Columbus Coated Fabrics Company inspects the hazardous waste storage area in order to discover any equipment malfunctions, operator errors, or discharges that would cause or lead to the release of hazardous waste.
- (b) The inspections are conducted for the specific purpose of:
 - (1) Determining if there are any leaks in the hazardous waste storage drums. If a problem is found, the foreman immediately notifies the proper persons to either fix the leak in the drum or transfer the material to a second drum.
 - (2) Checking the availability and soundness of safety and emergency equipment.
 - (3) Checking on operating equipment.
 - (4) Checking on security equipment.

(ii) Remedial Action

If inspections reveal that non-emergency maintenance is needed, damage and reduce the need for emergency repairs. If a hazard is detected during an inspection or anytime between inspections, remedial action will be taken immediately. Columbus Coated Fabrics personnel will notify the appropriate authorities per the Contingency Plan and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the Contingency Plan for further details.

-	The second secon	
INSPECTIO	HEDULE	- CCF

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Safety & emergency	Sand	Out of Stock	Weekly/as needed
equipment	Portable sump pump	Availability; functional	Weekly
	Telephone	Functional	Daily
	Fire Hose	Leaks; water pressure	Daily
	Sprinkle <u>ņ</u> system	Leaks; water pressure	Daily
	Emergency shower	Leaks; functional; Water pressure	Weekly
	First aid equipment	Items out of stock	Weekly
Security devices	Facility fence	Damage to chain link structure	Weekly
	Container storage bldg. door	Damage to structure	Daily
Container storage area	Container placement and stacking	Unobstructed aisle space; height of stacking; segregation of waste type	<u>-</u>
	Sealing of containers	Drums without lids; loose	
	Labeling of containers	Improper identification	Daily
	Containers	Corrosion; leakage; structural defects	Daily
•	Pallets	Damaged	Daily
	Base or foundation,	Severe cracks or	Daily
	ramps	deterioration; settling	
	Sump area	Debris; deterioration	Daily.
	Warning signs	Damaged, obstructed	Daily
	Haste storage bldg.	Roof, mindom integrity	Daily

INSPECT SCHEDULE - CCF (cont.)

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Container storage area (cont.)	General Waste storage area	Debris; unlabeled drums; drums out of place; obstructions to normal drum handling	Daily
	Brass or bronze tools	Availability; functional	Daily
Loading/unloading	Spill control sand	Out of stock	
dook	Obstructions to drum handling	Debris; standing obstructions, snow, ice, wet or oily surfaces	Daily
	Barrel truck	Functional	
Satellite accumu- lation area	Containers	Unlabeled drums; full drums; drums not moved to storage area within 72 hours	Daily

(6) Preparedness and Prevention Waiver Request

Not applicable.

(7) <u>Contingency Plan (Spill Prevention Control and Counter</u> Measures Plan

Columbus Coated Fabrics Division of Borden Chemical Borden Inc.

Facility is located at:

1280 North Grant Avenue Columbus, Ohio 43201

The operations performed at this facility are:

- 1. Production of vinyl sheeting.
- 2. Coating of vinyl fabric and paper substrates.
- 3. Printing on vinyl and paper.
- 4. Electroplating operations.
- 5. Production of rotogravure print.

The site plan showing the topography of the area, the adjacent land uses, and the adjacent land features is shown on Page 1a, Topographical Map of the CCF Co. & Surrounding Area.

The structural features of the Hazardous Waste Storage Building are shown on a plan view - Page 1b, and a section view - Page 1c.

COLUMBUS COATED FABRICS

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED



U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

David Ullrich, Director of Waste Management Division, H-7J U.S. EPA, REGION V 77 West Jackson Street Chicago, IL 60604

Re: SPCC for Columbus Coated Fabrics

Dear David:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

COLUMBUS COATED FABRICS

GT/rap attach.

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

RCRA CONTINGENCY PLAN

REVISED PLAN 12-91

Name of facility	Columbus Coated Fabrics
Location of facility	1280 North Grant Avenue, Columbus, Ohio 43201
	•
	CERTIFICATION
provisions of 40 CFF	t I have examined the facility, and being familiar with the R, Part 112, attest that this SPCC Plan has been prepared in od engineering practices.
	<u>С Кіснало Spaincen</u> Printed Name of Registered Professional Engineer
(Seal)	Signature of Registered Professional Engineer
Date 5-28-92	Registration No.62-34223 State Faces

Registration No. 62-34223 State Factoris

SPCC

(Spill Prevention Control & Counter Measures Plan)

and

RCRA CONTINGENCY PLAN

(Hazardous Waste Management Plan OAC 3745-54-52)

COLUMBUS COATED FABRICS

REVISED DECEMBER, 1991



INTER-COMPANY AND OFFICE CORRESPONDENCE

TO:

DISTRIBUTION

FROM:

GROVER THOMAS

LOCATED AT:

CCF

SUBJECT: Columbus Coated Fabrics' SPCC/

RCRA Contingency Plan

DATE:

December 19, 1991

Enclosed is your copy of the December 1991 revision of the SPCC/RCRA Contingency Plan for Columbus Coated Fabrics. This book has also been distributed to the local hospsitals and various City, State and Federal agencies (see distribution list on inside cover).

All emergency coordinators should review this document as soon as possible and become familiar with the contents, especially the emergency and evaluation plans.

GT/rap frover

DISTRIBUTION:

EMERGENCY COORDINATORS

G. Rusincovitch, Primary Coordinator

W. Judy

J. Weaver

R. Miller

J. Ochwat

D. Schaaf

G. Myres

K. Greene

M. Betts

J. Sykes

BORDEN

R. Springer, Env. Affairs

M. Horvitz, Law Dept.

CCF MAIN GATE

COLUMBUS COATED FABRICS

SPCC (Spill Prevention Control & Counter Measures Plan)

and

RCRA CONTINGENCY PLAN (Hazardous Waste Management Plan OAC 3745-54-52)

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George Rusincovitch (Primary Coordinator) Wayne Judy Jim Weaver Richard Miller Joe Ochwat Dan Schaaf Grover Thomas Glenn Myres Ken Greene Mike Betts John Sykes	2 4 5 6 7 8 9
HOSPITALS:	
Grant	13
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BORDEN:	
R. Springer, Environmental Affairs	
CCF MAIN GATE	25

DEC 1991
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SECTION ! - Description & Location of Facility

Operator:

Columbus Coated Fabrics Division of Borden Inc.

Facility is located at:

1280 North: Grant Avenue Columbus, Ohio 43201

The operations performed at this facility are:

- 1. Production of vinyl sheeting.
- 2. Coating of vinyl fabric and paper substrates.
- 3. Printing on vinyl and paper.
- 4. Electroplating operations.
- 5. Production of rotogravure print.

The site plan showing the topography of the area, the adjacent land uses, and the adjacent land features is shown on page 79, Topographical Map of the Columbus Coated Fabrics Co. and surrounding area.

The structural features of the Hazardous Waste Storage Building are shown on a Plan View - Page 80 and a Section View - Page 81.

SECTION II - History of Pollution Incidents Occurring

As per 40 CFR 112.7(a) there have been no "spills" resulting in pollution of public waters at Columbus Plant in the last twelve months. Leaks in underground storage tanks discovered in 1986 appeared to have resulted in some localized perched groundwater contamination. The tanks were removed and remedial plans have been submitted to the Ohio EPA for approval.

SECTION III - Pollution Potential at Plant Site

Area and building numbers noted in this Section - Building Plan, page 83.

A. Total quantities of hazardous chemicals and other substances stored at facility.

Inside Storage

- Area 3 Bldg. 95
- -- 10,000 gallons of Solvent Print Ink in 55 gallon drums (satellite storage area awaiting shipment to recycler).
- Area 4 Bldg. 82
- 5,000 gallons of Solvent Ink from suppliers.
- -- 5,000 gallons of DN-14 process ingredients composed of:
 - -- 1,250 gallons of Triethylamine raw material
 - -- 1,250 gallons of Isopropylacetate raw material
 - 2,500 gallons of Polyester Polyols and Polyisocyanates - coating ingredients for DN-14 process.

- Area 5 Bldg. 23
- -- 500 gallons of in-process coating materials for DN-14 process (see above).
- Solvent dispensing station for Methyl Ethyl Ketone and Methyl Isobutyl Ketone mixture into five-gallon safety cans.
- Area 6 Bldg. 15
- No chemicals are stored in this area at the present time.
- Area 7 Bldg. 15
- 1,800 gallons color pigment for PV coating.

(2nd Fl.)

Area 8 - Bldg. 15

(2nd Fl.)

3,500 cubic feet of clay, pigments, and PVC

resin in bags.

Area 9 - Bldg. 6	 Five 2,500 gallon tanks NOT IN USE 2,500 gallons of either water-based coating or plastisol in-process coating material stored in three 2,500 gallon tanks. 5,000 gallons in-process FN grinds (pigment and plasticizer) in three storage tanks on third level. 1,600 gallons of various latex and PVC coating materials in 15 mixers. 5,000 gallons water-based latex and/or PV coating in three mixers.
Area 10 - Bldg. 93 (2nd Fl.)	 Four 10,000 gallon tanks NOT IN USE
Area 11 - Bldg. 33 (2nd Fl.)	 150,000 pounds PVC resins in 50 lb. bags. 2,000 gallons of coating material in drums. 2,000 gallons of liquid adhesive in drums. 2,000 gallons of acrysol in drums. 1,600 gallons of emulsion in drums.
Area 12 - Bldg. 38 (2nd Fl.)	 24,000 lbs. PVC resins in 50 lb. bags and drums. Four 250 lb. drums aluminum powder.
Area 13 - Bldg. 38 (1st Fl.)	 4,000 lbs. PVC resin in 50 lb. bags. 160 55 gallon drums (9,000 gallons) adhesives and resins.

Areas 14 & 15 - Bldg 33		150 gallons PV coating.
(1st Fl.)	~~	18,000 lbs. movable containers of water-
		based inks.
	- *	500 gallons water-based ink pigments in five
		gallon containers.
	₩ ***	28,000 lbs. FN coating in two tanks.
		2,500 gallons water-based inks.
Area 16 - Bldg. 93		3,000 gallons water-based inks stored in
(1st Fl.)		movable carts.
Area 17 - Bldg. 35		7,300 gallons clear vinyl coating in 55 gallon
		drums.
		600 lbs. flitters.
		2,000 gallons PVC-based adhesive in two
		storage tanks.
	Apr Apr.	500 gallons PVC coating material in two
		mixers.
		3,800 gallons vinyl coating material in 55
		gallon drums.
Area 18 - Bldg. 58		4,300 gallons plastisol coating (PV & VC) and
		clear vinyl resin coating stored in 55 gallon
		drums.
		1,600 gallons of plastisol coating (PV & VC)

and clear vinyl/resin coating in mixers.

Area 19 - Bldg. 85		Approximately 500,000 lbs. of dry raw materials (pigments, clay, calcium carbonate, PVC resins, dry stabilizer) stored in bags and fiber drums. 30,000 lbs. liquid stabilizer.
Area 20 - Bldg. 85 (2nd Fl.)		3,600 lbs. various plasticizers temporarily stored in in-process weigh tanks.7,000 lbs. of various liquid stabilizers stored in drums and totes.
Area 21 - Bldg. 67		2,500 lbs. various liquid plasticizers temporarily (2nd Fl.) stored in holding tank.
Area 22 - Bldg. 85 (2nd Fl.)	֥	1,800 lbs of various plasticizers temporarily stored in holding tank.
Area 23 - Bldg. 104 (2nd Fl.)		1,800 lbs. of various plasticizers temporarily stored in holding tank.3,000 lbs. of various pigments in fiber drums and bags.
Area 24 - Bldg. 109 (2nd Fl.)		1,800 lbs. of various plasticizers temporarily stored in holding tank.
Area 25 - Bldg. 109 (2nd Fl.)		50,000 lbs. of clay and calcium carbonate stored in bags.

Area 26 - Bldg. 109 (2nd Fl.)		10,000 lbs. of various pigments in fiber drum and bags.	
Area 27 - Bldg. 104 (1st Fl.)		1,000 gallons lube oil in 55 gallon drums. 3,600 lbs. lubrication grease.	
Area 28 - Bldg. 104 (2nd Fl.)		5,000 lbs. of resin and pigment in-process materials.	
Area 29 - Bldg. 111		 2,000 gallons ink pigments in 55 gallon drums and 5 gallon pails. 7,000 gallons in-process mixed solvent inks in 55 gallon drums. 7,100 lbs. small (200 lb.) portable containers of process solvent inks. 21,000 lbs. large (1,500 lb.) portable containers of process solvent inks. 220 gallons solvent ink in four 55 gallon drum mixers. 1,200 gallons solvent ink in six 200 gallon drum mixers. 	
Area 30 - Bldg. 86	•••	600 gallons water-based ink pigments in 5 gallon pails. 2,500 gallons mixed water-based inks in 55 gallon drums.	

Area	31	Bldas.	37	ጴ	39
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- Hazardous Waste Storage Building (Maximum of 450) 55 gallon drums of various hazardous wastes:
- -- Chromic Acid Rags & Sludge -- D007
- -- Chromic Acid Soaked Rags D007
- -- Drum Wash Residue (High Pressure Water) D008
- -- Limestone Sump Plating Residue (Liquid) F006
- -- Linestone Sump (solid) F006
- -- Oil Blend Filters (Premix) D006
- -- Spent Muriatic Acid D002 & D007
- -- Muriatic Soaked Rags D007
- -- Spent Chrome Stripper D007
- -- Flammable Ink Residue (solid/Liquid) F003 & F005
- -- Urethane Waste (solid/Liquid) D001 & F005
- -- Plasticizer Residue from dust stop seals Cadmium contaminated D006
- -- Waste Lubricating Oils (Non-Hazardous)
- -- Contaminated Raw Materials (Solid/Liquid)
- -- Waste Waterbase Ink (Non-Hazardous)
- -- Waste Waterbase Urethane Ink (Non-Hazardous)

Area 32 - Bldg. 101

- -- The following is a list of miscellaneous items stored and used in plating operation:
 - -- 80 gallons Aerodet Heavy Duty Cleaner
 - -- 55 gallons Muriatic Acid
 - -- 26 gallons Sulfuric Acid
 - -- 500 lbs. Chromic Acid
 - -- 400 lbs. Copper Sulfate
 - -- 150 lbs. Sodium Hydroxide
 - -- 100 gallons Anode Cleaner (contains 100 lbs. sodium hydroxide/50 lbs. rochelle salt)

Area 32 (Con't.)

- -- 55 gallons Naptha
- 30 gallons Rust and Corrosion Preventive
- -- 20 gallons Degreaser
- -- 15 gailons Non-Chlorinated Ink Stripper
- -- 55 gallons Globrite 200 (contains muriatic acid)
- -- 65 gallons Non-Chlorinated Ink Remover acidic and mildly corrosive
- -- 110 gallons Gear and Hydraulic Oil
- -- The following is a list of plating baths and quantities: (See location of Plating bath in map detail on page 84.)
- 450 gallon Copper Plating Bath (mixture of water, copper sulfate and sulfuric acid) - CP 019
- 370 gallon Copper Plating Bath (mixture of water, copper sulfate and sulfuric acid) - CP 020
- 378 gallon Chrome Plating Bath (mixture of water, chromic acid and sulfuric acid) CP 002
- 4. 388 gallon Chrome Plating Bath mixture of water, chromic sold and sulfuric sold CP 023

Inside Storage

Area 33 - (North of

Building 85)

- 1,500 gallons Liquid Stabilizer (stored in 55 gallon drums)

- Tank #16 6,100 gallons Diesel Fuel ABOVE GROUND
- Tank #17 6,100 gallons Diesel Fuel ABOVE GROUND
- Tank #31 10,000 gallons MIBK UNDERGROUND
- Tank #32 10,000 gallons MEK UNDERGROUND
- Tank #33 10,000 gallons (Overflow for Spill Protection) UNDERGROUND
- Tank #34 10,000 gallons (EMPTY Stand by/Spill Protection) UNDERGROUND
- Tank #35 10,000 gallons 50% MEK and 50% Reclaimed Solvent UNDERGROUND
- Tank #36 10,000 gallons Mineral Spirits UNDERGROUND
- Tank #43 10,000 gallons R 501 (Epoxidized Soybean oil) ABOVE GROUND
- Tank #44 10,000 gallons R 641 (DOP Plasticizer) ABOVE GROUND
- Tank #45 10,000 gallons R 680 (Adipate Polymeric

 Plasticizer) ABOVE GROUND
- Tank #57 12,000 gallons R 675 (Polymeric Plasticizer) ABOVE GROUND
- Tank #58 12,000 gallons **NOT IN USE** ABOVE GROUND
- Tank #59 12,000 gallons R 582 (Mixed Alkyl Phthalate) ABOVE GROUND

- Tank #60 12,000 gallons R 599 (Dioctyl Adipate) ABOVE GROUND
- Tank #61 12,000 gallons R 685 (DINP) ABOVE GROUND
- Tank #65 10,000 gallons R 582 (Mixed Alkyl Phthalate) ABOVE GROUND
- Tank #66 10,000 gallons R 685 (DINP) ABOVE GROUND
- Tank #71 5,000 gallons NOT IN USE ABOVE GROUND
- Tank #72 5,000 gallons **NOT IN USE** ABOVE GROUND
- Tank #73 5,000 gallons NOT IN USE ABOVE GROUND
- Tank #74 5,000 gallons R 676 (Phosphate Plasticizer) ABOVE GROUND
- Tank #78 6,000 gallons CS 003 (Liquid Nitrogen) ABOVE GROUND
- Silo #1 225,000 pounds R 630 (PVC Resin) ABOVE GROUND
- Silo #2 225,000 pounds R 630 (PVC Resin) ABOVE GROUND
- Silo #3 225,000 pounds R 659 (PVC Resin) ABOVE GROUND
- Silo #4 NOT IN USE ABOVE GROUND
- Silo #5 225,000 pounds R 653 (PVC Resin) ABOVE GROUND
- Silo #6 225,000 pounds R 621 (PVC Resin) ABOVE GROUND

B. <u>Largest Potential Spill</u> -- the greatest potential spill is from tanks numbered 43 to 45, 57 to 66 and 71 to 74. These liquids are all plasticizers which are not highly flammable, but must be considered pollutants should the material get into the sewers. In the event of a spill, these tanks would drain and would be contained on the property due to a concrete and sand bag dike wall constructed around the tanks on the west, south and east sides. The north side is contained by Buildings Nos. 59 and 64.

A second greatest potential spill is from the tanks numbered 16 and 17, containing 6,100 gallons of diesel fuel each. These tanks are completely diked to contain the total contents of both tanks.

A third greatest potential spill is from the inside process storage tanks. Spills from these tanks can be contained within the building. If spills are large enough to reach a floor drain, the floor drain can be blocked by using bags of clay or scrap cloth that is available.

C. Potential Causes of Spills

- Employee negligence inaccurate inventory and filling tanks to overflowing condition, knocking over drums or puncturing drums, allowing liquids to discharge onto ground and eventually drain into combination storm and sanitary sewer.
- 2. High winds, tornadoes, explosions, earthquakes, or equipment failure, etc., could cause rupture of tanks or pipe lines, allowing liquid to eventually drain into combination storm and sanitary sewer.
- Acts of vandalism tanks could be ruptured maliciously or liquids could be dumped onto the ground into sewer manholes or drains.

SECTION IV - Spill Prevention and Containment

A. Exterior Storage

- 1. <u>Tanks</u> <u>Diesel Fuel</u> tanks are diked with sufficient area and height to contain entire volume of tanks. <u>Plasticizer Tanks</u> 43 to 45, 57 to 66 and 71 to 74 are not adjacent to storm drains, but they are near to Parker Alley which has a gradual slope toward Fifth Avenue. The tanks are contained by means of a concrete and sand bag dike.
- 2. <u>Tank Trucks</u> Tank trucks are unloaded at two stations. Each of these areas represents a potential spill area that could eventually drain into the combination storm and sanitary sewers.

A plan has been developed for the unloading site at the north end of the facility which consists of the use of a cover plate and sand bags over a sewer opening. In the event of a spill, it then can be contained by the land contour.

A separate plan has been developed for the unloading site at the south end of the facility which consists of installing a ramp at the exit of Parker Alley plus the use of sand bags and booms (stored in the area) to prevent a potential spill from reaching the sewer opening at Fifth Avenue.

B. <u>Interior Storage</u>

The location of containers and in-process vats/tanks are mostly located in areas without floor drains. Spills from these containers would be small and could be contained inside the building.

C. Plating (Area 32)

In the event of a rupture of one of the plating tanks:

- a. The drain into the sump is to be plugged and the liquid drains into the underfloor trench. This will prevent eventual discharge into the sanitary sewer.
- b. Maintenance will be notified immediately in order to pump the liquid into drums for disposition as per RCRA regulations.

D. <u>Hazardous Waste Storage Building (Area 31)</u>

- Because fire is always a potential hazard in spills of flammable materials, possible sources of ignition have been eliminated. Vehicular traffic and hazardous work in the area will cease until the spill is contained and safety is restored.
 - a. If spilled material is flammable, the fire brigade will maintain a watch while the spill is removed.
 - b. The spill will be pumped with a portable pump from the sump in the storage building into Type 17E or 17H Hazardous Waste Storage Drums (orange).
 - c. The drums containing the spilled waste will be manifested out to the appropriate approved Hazardous Waste disposal facility.
 - d. Any remaining areas on the floor of the building containing spilled liquid will be squeegeed and soaked up with a floor dry type of absorbent and/or an absorbent type pillow.

- 2. Contaminated water generated as a result of Fire Control.
 - a. In the event of fire control where quantities of water generated in the storage area are sufficient to exceed the containment capacity an emergency containment dike of sand and/or absorbent pads would be placed across the concrete roadway leading away from the hazardous waste storage building.
 - b. Contained water will be analyzed to determine if contaminated.
 - c. If the contained water is contaminated, it will be drummed into Type 17E hazardous waste storage drums (orange) by means of a portable pump and manifested out to the appropriate hazardous waste disposal facility.
- Determination and identification of hazardous materials involved in an emergency.
 - a. If the spill is the result of a drum leak, then the leaking drum can be visually identified from the hazardous waste label affixed in order to determine the type of hazardous material involved. Inspection/operating records will be reviewed and, if necessary, chemical analysis of the spilled material and/or container contents will be conducted.

- 4. If operating personnel notice any emergency, such as a spill, they will notify their foreman at once and take immediate steps to contain the emergency. If the emergency is a fire, the fire alarm in the area (on exterior wall of Bldg. #36 within 60 ft. of Hazardous Waste building door) will be activated which alerts the CCF emergency brigade and the City of Columbus Fire Department.
 - a. If the emergency is such that it cannot immediately be contained by the operators and foreman, one of the emergency coordinators will be notified by the foreman.
 - b. GEORGE RUSINCOVITCH, Primary Emergency Coordinator, or, in his absence, any of the alternate emergency coordinators listed on page 23 shall immediately react to the notification of an emergency by proceeding at once to the location of the emergency.
 - c. They will assume authority for obtaining and directing the necessary equipment and personnel respectively in order to contain and eliminate the cause of the emergency. If the emergency is a spill, maintenance personnel are notified and dispatched with a portable pump to the emergency area.

- d. The emergency coordinator will have the following resources in order to determine if the emergency situation presents a serious threat to human health inside and outside the facility.
 - (1) Visual Inspection
 - (2) On-site Analytical Capabilities (See Section VIII, page 39)

To supplement the on-site capabilities, the emergency coordinator will contract with an outside laboratory. When the determination of the contamination is not evident, samples will be collected by qualified CCF personnel or by outside contractors. Any release beyond the RQ levels and beyond the boundaries of the facility will be treated as if it presents a threat to health and will cause the emergency coordinator to take any possible mitigating action.

e. In response to a fire, explosion or release, hazardous waste activity will be ceased. The areas will be monitored by the operator for the unlikely occurrence of leaks, pressure build-ups, gas generation and ruptures in pipes or valves, as applicable.

When the emergency is under control and emergency equipment is decontaminated, renovated and returned to its proper location, the Hazardous Waste facility will be reactivated.

- 5. In the event of an emergency at the Hazardous Waste Storage building (such as a fire or a spill), the necessity for evacuation of any of the plant employees will be made on site by the Columbus Coated Fabrics Emergency Coordinator in coordination with the City of Columbus fire personnel. There would be no need to evacuate any residents, as there are none residing in any proximity to the Hazardous Waste area.
- 6. If a spill emergency is encountered outside of the storage building, there are three locations with emergency sand and absorbent booms available that can be used to contain the spill. All caution should be exercised to prevent spills from reaching the sewer system. Should these efforts be unsuccessful and the spill reaches the sewer, the City of Columbus Fire Department (911) and the City of Columbus Surveillance Section (645-7016) should be contacted immediately.
- 7. Any spills contained inside the Hazardous Waste storage building (the 4" high ramp will contain any such spill) will be pumped from the existing sump into Hazardous Waste drums. Any residual liquid on the floor will be squeegeed into the sump and also pumped into Hazardous Waste drums.

- a. Any liquid from exterior spills caught in the sand diked areas will be pumped into Hazardous Waste drums. Shovels will be used to drum any spilled solids.
- b. The Hazardous Waste drums will be sent to the appropriate licensed Hazardous Waste landfill.
- 8. All equipment used during emergency cleanup will be steam cleaned, if required, rinsed and placed in their respective storage areas; this will be done prior to the resumption of operations. Any contaminated wash waters collected from the cleaning will be drummed to Hazardous Waste drums and disposed of at a licensed disposal facility.
 - a. Any equipment, such as gloves, cloths, contaminated sand, absorbent pads, etc., which may be contaminated beyond the potential for cleaning will be collected, drummed and disposed of to a licensed disposal facility.
 - Hazardous waste activity will resume only after all hazardous
 waste is containerized and the area is determined to be clean.
- 9. Spill related equipment available.
 - a. A portable pump for removal of spills from the sump inside the Hazardous Waste storage building or from emergency diked areas, is stored in the yard adjacent to the Hazardous Waste storage building.

- b. Emergency sand and/or absorbent material is contained in drums at the Hazardous Waste Storage building, unloading dock and the location where the roadway leaves the fenced area.
- c. Shovels for distribution of the emergency sand are stored in the vicinity of the drums containing the sand.
- d. Squeegees are available in the area for cleaning residual liquids from the affected area.
- e. A cover plate for the sewer drain is located on the west exterior wall of Building No. 95.
- f. Temporary dikes can be built from sandbags, loose sand or oil absorbent material in the event of a spill. Maintenance men would pump contained spills into 55 gallon drums and use absorbent materials in final clean-up.

E. Facility Drainage

All drainage from this facility drains into either a sanitary sewer system or into a separate storm sewer system.

F. Plant Security

All access to the facility is protected by security fence. There is a security guard service in attendance at all times with regular guard tours controlled by ADT security watch, at night, holidays and weekends. The area surrounding the plant is reasonably well lighted.

G. Characteristics and Potential Hazards of Wastes

 Page 85 contains the laboratory analyzed characteristics of the normally generated Hazardous Waste Streams.

- 2. Hazards associated with the Hazardous Wastes.
 - a. Heavy metals and solvents composed of mostly MEK (Methyl Ethyl Ketone) are contained in the stored Hazardous Wastes (see page 85).
 - Occasionally some raw materials that could be declared a waste,
 contain flammable solvents.
 - c. Other than the wastes noted on the following pages, there is:
 - HCl gas would be a major combustion product if the solvent ink residue or off-spec PVC resin is burned.
 - The Dust Stop would generate, if burned, some heavy metals in the smoke.
- 3. There are no secondary hazards beyond those identified in 1 or 2 above.
- 4. Due to smoke generation and the possibility of heavy metals in the smoke, personnel involved with a fire would take precautionary measures such as wearing of SCBA consistent with good fire fighting practices.
- 5. There are no incompatible materials.
- 6. Additional small quantity wastes generated are tested upon their arrival in the Hazardous Waste building in order to determine their toxicity regarding proper disposal.

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SECTION V - Contingency Plan to be Followed in the Event of a Fire, Release, or Spill

- A. Emergency Response Notification Procedure for CCF Employees and Security.
 - 1. In the event of a fire that is not detected by ADT, the following procedure should be followed:

FIRE, RELEASE, or MAJOR SPILL: Pull alarm or dial "911" for the telephone operator and say, "I want to report a (fire, release, or major spill)". The operator will then connect you with the Fire Department Operator. Give the name and complete address of your facility and the exact location of the (fire, release, or spill) using "East", "North", etc. Do not hang-up until you are sure that the Fire Department Operator has the name and address correctly.

NOTE:

If the Emergency Brigade is on the premises, you will notify them by using the paging system. They will handle the situation until the Fire Department arrives.

2. Then you will call the CCF Key Personnel. They are to be called in the order listed below. First person on the list to be called first, second person to be called second if unable to reach first person, etc., regardless of title.

CCF Key Personnel

<u>Title</u>	<u>Name</u>	Office Phone	Home <u>Phone</u>
Primary Emergency Coordinator:			
Technical Mgr./Chief Engineer	George Rusincovitch	×6122	9/885-9414
Alternate Emergency Coordinators:			
Plant Manager	Wayne Judy	x6104	9/895-6981
Director of Manufacturing	Jim Weaver	x6127	9/764-2346
Manager Safety/Security	Richard Miller	x6078	9/337-9608
Maintenance Superintendent	Joe Ochwat	x6113	9/882-1578
Emergency Squad Chief	Dan Schaaf	x6098	9/965-3619
Environmental Manager	Grover Thomas	x6097	9/890-0463
Engineering Manager	Glenn Myres	x6045	9/891-2712
Supv. Tool/Chrome Plate	Ken Greene	x6095, 6115	9/548-7650
General Manager	Mike Betts	×6068	9/764-2944
Environmental Coordinator	John Sykes	x6043	9/457-9339

3. Borden Corporate

Operation Alert - 614/457-5200

Corporate Personnel

Tiele	Biomo	Office	Home
<u>Title</u>	<u>Name</u>	Phone	<u>Phone</u>
Environmental Affairs Manager	Rick Springer	9/431-6667	9/436-7004
Regulatory Attorney	Martha Horvitz	9/225-4473	9/486-7946
Manager Media Communication	Jeanne Washko	9/225-4472	9/457-6859

4. CCF Main Gate (Security)

x6050

5. Agency Telephone Numbers

Phone # Work Hours	Other Than Work Hours	Agency
9/911 24 Hours	9/911 24 Hours	Columbus Division of Fire, Alarm Office - will in all probability be in the agency initially contacted.
9/911 24 Hours	9/911 24 Hours	Columbus Emergency Squad - the Emergency Squad takes injured to a hospital determined after arrival at the plant.
9/1-800-424-8802 24 Hours	9/1-800/424-8802 24 Hours	National Response Center (NRC) - the NRC will be notified in the event of fire, explosion, evacuation, or any spill greater than the reportable quantity.
9/469-9700	9/462-3333 Pagers 30, 31, 32 - 4:30 p.m. to 8:00 a.m. MonFri. Sat. & Sun.	Emergency Management Agency of Franklin County (EMAFC) - will be notified in the event of any spill or release, will supply support personnel at the Field Command Post and will provide a clearinghouse of Hazardous Material incidents.
9/911 24 Hours	9/911 24 Hours	Columbus Division of Police (CDP) - The CDP will maintain area security and traffic control.
9/645-7159 9/222-6181 7:30 a.m. to 4:30 p.m. MonFri.	9/221-9600 4:30 p.m. to 7:30 a.m. MonFri. Sat. & Sun.	Columbus Health Department (CHD) - will be notified when an incident threatens public health and safety.
9/1-800/282-9378 24 Hours	9/1-800/282-9378 24 Hours	Ohio Environmental Protection Agency (OEPA - Emergency Response) - will be notified when they can provide aid or the environment is threatened.

6. Alternate Agency Telephone Numbers (if required)

Phone # Work Hours	Other Than Work Hours	Agency
9/253-7981 24 Hours	9/253-7981 24 Hours	American Red Cross (ARC) - will be notified to begin internal processes in event of evacuation.
9/645-7016*	9/645-7102 24 Hours	Columbus Division of Sewers & Drains (CDSD) - will be notified whenever hazardous materials from an incident might be or have been discharged into the sewer system. *NOTE: The City requires the generator to notify the Surveillance Section Laboratory at 614/645-7016, immediately of any discharge that gets into the sewer system, to enable countermeasures to be taken to minimize damage to the wastewater treatment system and/or the receiving waters. If no one is available to accept the telephone notification, leave a message on the recorder and call 614/645-7102, which is answered twenty-four (24) hours a day, for further notification.
9/645-7788 24 Hours	9/645-7788 24 Hours	Columbus Division of Water (CDW) - will be notified in any incident which threatens the public water supply.
9/461-1576 (Leak) 24 Hours	9/461-1576 (Leak) 24 Hours	Columbia Gas Co will be notified in case of a natural gas leak or outage.
9/836-2570 24 Hours	9/836-2570 24 Hours	<u>Columbus Southern Power</u> - will be notified in case of an electrical outage.
9/1-800/589-4628 (spas) 9/1-800/686-2878 (UST's) 24 Hours	9/1-800/589-4628 (spiks) 9/1-800/686-2878 (UST's) 24 Hours	State Fire Marshall (SFM) - will be notified when they can provide aid.
9/1-800/424-9300 24 Hours	9/1-800/424-9300 24 Hours	<u>Chemtrec</u> - will be notified when they can provide aid in chemical situations.
9/889-7150 24 Hours Additional Telephone	9/889-7150 24 Hours	Ohio Emergency Management Agency (OEMA) - will be notified to provide aid in radiological situations when needed.

7. Additional Telephone Numbers (if required)

Medical Emergency Numbers

Poison Control Center	9/228-1323
	9/1-800/682-7625
Doctor's Hospital North (Emergency Room)	9/297-4074
Riverside Hospital (Emergency Room)	9/566-5321
Grant Hospital (Life Flight)	9/1-800/222-5433
Grant Hospital (Emergency Room)	9/461-3270
University Hospital (Emergency Room)	9/293-8333
Red Cross	(24-Hour Hotline) 9/253-8888

7. Additional Telephone Numbers (if required) (Con't.)

Additional Security Numbers

Sheriff Pinkerton Office Cpt. McDonald (CCF Site Security Supervisor)

9/462-3333 9/486-7732 (Office) x6050 (Home) 9/267-7365

Additional CCF Personnel Numbers

<u>Title</u>	Name	Office Phone	Home <u>Phone</u>
Nurse	Mary Mosher	x6040	9/761-7546
Mgr. Employee Relations	Tom Ness	x6198	9/882-9548

Utilities

Electric Company Gas Company Telephone Company

Water Company

Columbus Division Sewers & Drains

(Outage) 9/836-2570 (Leak) 9/462-1576 & (Outage) 9/460-2222 (24-Hour Hottine) 9/1-800/572-4747

(Computer enswers--Remain on line to speak with person) (Days) 9/645-8270

Nights/Weekends) 9/645-7788 (Days) 9/645-7016

(Nights/Weekends) 9/645-7102

B. Agency Functions

Columbus Division of Fire

The Columbus Division of Fire is the responsible city agency for primary coordination of activities of city agencies when a hazardous material incident occurs. During such emergencies, CFD may require support from other local agencies depending upon the severity of the emergency and agency capabilities. The CFD shall be considered the primary city agency for preventing or mitigating the effects of hazardous material incidents.

Columbus Division of Police

The Columbus Division of Police will assist with area security, traffic control, and evacuation of the area as needed in the event of a hazardous materials incident.

Columbus & Franklin County Disaster Services Agency

The Columbus & Franklin County Disaster Services Agency will, upon notification of a hazardous material incident, activate the county emergency operations center. From this location, population, resource and hazardous material data as well as inter-agency (local, state and federal) coordination will be provided as requested or as obtainable. A field operations officer will, according to standard operating procedure, also be available at the Field Command Post to perform on-site liaison/coordination duties for single and multi-jurisdictional incidents.

Columbus Health Department

With respect to the potential immediate release or long-term effects from hazardous materials incidents, the CHD assures that such potential effects are recognized and assessed expeditiously. CHD has the responsibility for the protection and promotion of the people of Columbus through organized efforts to control those elements which may be or may become harmful to human health. CHD has primary responsibility for the following:

- a. Investigating human health effects resulting from hazardous materials exposure.
- b. Providing clinical consultation in the event of such incidents or exposures.

B. Agency Functions (Con't.)

Franklin County Chapter of the American Red Cross

The American Red Cross will assist in the relocation of residents in incidents involving hazardous materials and coordinate the resources available including shelters, food, clothing, first aid, and other basic services such as inquiries regarding the welfare of evacuated persons.

Columbus Division of Sewerage and Drainage

The Columbus Division of Sewerage and Drainage investigates and regulates any discharge of hazardous materials to the sewer system.

Columbus Division of Water

Columbus Division of Water investigates potential threats to drinking water sources from incidents involving hazardous materials.

Raw water sources include Griggs and O'Shaughnessy reservoirs on the Scioto River, and Alum Creek and Hoover reservoirs on Big Walnut Creek. Spills or improper storage of hazardous materials in the watershed of these river systems, including tributaries, shall be considered potential threats to water supply for Columbus. The most immediate and dangerous threats are along tributaries having confluence below reservoirs, but above the water plant intakes. Most notable is Dry Run Creek, located in an industrial portion of the Scioto River basin. Notification of Dublin Road Water Plant personnel must be immediate, upon discovery since time of travel from Dry Run to the water plant can be as short as two hours.

Finally, hazardous materials incidents affecting reaches of the Scioto River and Big Walnut Creek in southern Franklin County must also be considered a threat to water supply since these rivers recharge the aquifer which supplies the South Well Field. Additionally, spills on land within the zone of recharge from rainfall can threaten the quality of the aquifer for water supply.

The Division of Water, upon notification of a hazardous materials incident, will determine the extent of immediate action required if water supply is threatened and the extent of remedial action, laboratory testing, or additional investigation required in a coordinated effort with appropriate state and city personnel.



INTER-COMPANY AND OFFICE CORRESPONDENCE

TO:

DISTRIBUTION

FROM:

MIKE BETTS

LOCATED AT:

CCF

SUBJECT: EMERGENCY - Notification Procedures

DATE:

December 2, 1991

Mr. George Rusincovitch, Technical Manager/Chief Engineer of Columbus Coated Fabrics, located at Seventh and Grant Avenue, Columbus, Ohio, in his position as Emergency Coordinator, has the authority to use any needed resource to implement emergency procedures for spill control, fire control, or any other incidents under the Contingency Plan.

In his absence, the alternate Emergency Coordinators listed have the same authority. In the event of an emergency, they will be called in the order listed:

1. George Rusincovitch -- Technical Manager/Chief Engineer Emergency Coordinator 6987 Eastview Drive

Columbus, OH 43085

Home Phone: 614/885-9414 Office Phone: 614/297-6122

2. Wayne Judy -- Plant Manager 1158 Forest Glen Rd. Westerville, OH 43081

Home Phone: 614/895-6981

Office Phone: 614/297-6104

3. Jim Weaver -- Director of Manufacturing 8606 Finlaria Dr.

Dublin, OH 43017

Home Phone: 614/764-2346

Office Phone: 614/297-6127

Richard Miller -- Manager of Safety/Security 4.

> 4808 Woodstream Ct. Gahanna, OH 43230

Home Phone: 614/337-9608

Office Phone: 614/297-6078

5. Joe Ochwat -- Maintenance Superintendent

> 6456 Cherokee Rose Dr. Westerville, OH 43081

Home Phone: 614/882-1578

Office Phone: 614/297-6113

6. Dan Schaaf -- Supervisor & Chief of the Emergency Squad

> 277 Orchard Lane Sunbury, OH 43074

Home Phone: 614/965-3619 Office Phone: 614/297-6098

7. Grover Thomas -- Environmental Manager 86 Spring Hollow Lane

Westerville, OH 43081

Home Phone: 614/890-0463 Office Phone: 614/297-6097

8. Glenn Myres -- Manager of Engineering 2712 Central Park Place Columbus, OH 43231

> Home Phone: 614/891-2712 Office Phone: 614/297-6045

9. Ken Greene -- Supervisor, Tooling & Chrome Plating Dept. 2460 E. Orange Rd.

Galena, OH 43021

Home Phone: 614/548-7650 Office Phone: 614/297-6095

614/297-6115

10. Mike Betts -- General Manager 2258 Sawbury Blvd.

Worthington, OH 43085 Home Phone: 614/764-2944

Office Phone: 614/297-6068

John Sykes -- Environmental Coordinator 11. 1224 Slade Avenue

Columbus, OH 43235

Home Phone: 614/457-9339 Office Phone: 614/297-6043

МВ/гар

DISTRIBUTION:

Robin Bryant

Bill Cheek

Craig Conroy

Ken Greene

Bill Griffin

Doug Joyner

Wayne Judy

Bob Kornmiller

Pat Kuskowski

Richard Miller

Mary Mosher

Glenn Myres

Tom Ness

Joe Ochwat

Umi Pateriya

Larry Randall

George Rusincovitch

Dan Schaaf

John Sykes

Grover Thomas

Jim Weaver

CCF Main Gate

Justial & Betts

SECTION VI - Fire and Explosion Emergency Action Plan

<u>Purpose</u>

To ensure the safety of all employees in the event of a major fire and/or explosion, or other incident of major proportions.

Procedure

A. On Duty Personnel Assignments:

In the event of a major fire and/or explosion, or other incident of major proportions in one of the manufacturing areas, the following basic assignments shall be carried out.

1. Shift Superintendent

a. The operating shift superintendent in the area of the disaster shall be in complete charge and direct the Emergency Brigade in fire fighting and emergency activities. (If the Columbus Fire Department is involved, the Columbus Fire Chief will be in charge.)

2. Operating Foremen

THIS WILL BE THE SIGNAL TO BEGIN EVACUATION

- a. Activate the area fire alarm, call Emergency Squad (dial 9-911) in case of personal injuries call First Aid (dial 6040).
- b. Report disaster emergencies other than fire and explosion on the company public address system, (dial 70) and report the type of emergency and the location of emergency. Repeat the announcement at least 2 times.
- c. Notify the main gate guard (dial 6050) of the location of the emergency and the arrival of the Emergency Squad.
- d. Shall direct the shut down of necessary equipment to minimize danger and loss.
- e. Evacuate all personnel, not needed in the emergency, via the designated evacuation route, to the designated assembly area and account for all personnel that report to him.
- f. Contact departmental superintendent or request guard to do so.

3. <u>Emergency Brigade</u>

a. Immediately following the fire alarm or reporting of an emergency, members of the Emergency Brigade will report to the emergency area to execute orders under the direction of the ranking Brigade member.

- b. Members of the Emergency Brigade with special assignments shall proceed to their assigned posts and execute the special duties and remain there until relieved by Brigade Chief unless otherwise instructed.
 - 1). Sprinkler valves
 - 2). Gate men
- c. The Emergency Brigade will fight fires in the incipient states only. Upon the arrival of the City Firemen and equipment, Emergency Brigade members shall be relieved of fire fighting duties.
- d. The Emergency Brigade will assist in salvage and clean up duties and other assignments as directed by the operating foreman to minimize danger and loss.
- e. A Brigade member shall be designated to meet emergency fire equipment at gate nearest to emergency area.

4. Shift Maintenance Foreman

- a. Immediately following the fire alarm or reporting of an emergency, shift maintenance supervisors shall report to the emergency area and direct the necessary maintenance activities.
 - 1). In accordance with the pre-arranged plan:

Ensure an electrician is dispatched to man the fire pump.

Ensure a pipe fitter is dispatched to man the sprinkler valve controlling the fire area.

Shut off flammable gas and liquid systems in the emergency area.

5. Security Guards

- a. Guards will announce the arrival of City Fire Equipment and Emergency Squads and direct equipment to plant entrance nearest the emergency area.
- b. Guards will permit only authorized personnel and emergency vehicles to enter the plant.
- c. Guards, when authorized by supervision, will call persons as listed on the Emergency Call list.
- d. Guards will remain at the phone in the Main Gate House to assure all areas receive the emergency call.

e. All media representatives shall be directed to the Personnel Manager.

B. On Arrival Personnel or Day Hours Assignments:

1. Plant Manager/Departmental Superintendents

Assume direction of emergency activities.

2. Safety/Security Manager

Coordinates the loss control activities.

3. First Aid Attendants

- Direct all first aid activities.
- b. Keep record of casualties and disposition of injured employees.

4. Personnel Manager

- a. Obtain authorization to coordinate arrangements for News Releases and Media inquiries.
- b. Ensure the notification of families of injured or hospitalized employees.

5. <u>Maintenance Superintendent</u>

- a. Ensure proper shut down of necessary equipment.
- b. Direct all emergency repair.

C. <u>Hazardous Waste Storage - Control Procedures for Fires & Explosions Area 31</u> (see Area & Building No's. Map - Page 83)

- 1. The entire Hazardous Waste Storage Building is separated from the main factory complex by a concrete roadway in the west side and a concreted area approximately 15 ft. wide on the north side.
- 2. The Hazardous Waste Storage Building is protected from fire by a wet sprinkler system. The sprinkler system heads are located for a coverage in excess of "high hazard protection" (a maximum of 69 sq. ft. of floor space per sprinkler head).
- 3. In addition to the sprinkler system, a 1 1/4 inch, 75 foot wall mounted fire hose reel is available connected to the internal fire system of the facility. This is located directly across the roadway west of the Hazardous Waste Storage Building. This hose will reach to the center of the storage building.

- 4. The storage building is easily accessible for fire fighting vehicles and equipment for both city fire fighting equipment and the plant fire brigade. See Traffic Patterns Map (page 82) for Access Routes. The fire brigade will fight any fire until outside assistance has arrived.
- 5. The following action will be taken in the storage area in the event of a fire:
 - a. Fire doors in adjacent area will be closed.
 - b. Hazardous work in the area will be shut down immediately.
 - c. All equipment in the area will be shut down, as necessary and practical.
 - d. The Emergency Coordinator will be contacted (see page 23).
 - e. The area will be cleared of all personnel not actively involved in fighting the fire.
 - f. All injured persons will be removed, and medical treatment will be administered by qualified personnel.
- 6. The Emergency Coordinator will have the following resources in order to determine if the emergency situation presents a serious threat to human health inside and outside the facility.
 - a. Visual Inspection.
 - b. On-site Analytical Capabilities. (See Section VIII, page 39)
- 7. If the emergency coordinator determines that Columbus Coated Fabrics has had a fire, release or explosion which could threaten human health or the environment, the emergency coordinator shall immediately notify the Ohio EPA emergency response team using their 24 hour toll free telephone number 800/282-9378 and shall provide the following information:
 - 1. Name and telephone number of reporter.
 - 2. Name and address of facility.
 - 3. Time and type of incident.
 - 4. Name and quantity of material involved.

- 5. The extent of any injuries.
- 6. The possible hazards to human health or the environment outside Columbus Coated Fabrics.

The Emergency Coordinator will also notify as appropriate:

a. Operation Alert	9-457-5200
b. Borden Environmental Affairs	9-431-6667
c. Borden Regulatory Attorney	9/225-4473
d. Borden Media	9/225-4472
e. CCF Main Gate (Security)	x6050
f. National Response Center	9-1-800-424-8802
g. Columbus Health Department	9/645-7159
g. colonisto Hodia. 2 oparament	9/222-6181 (7:30 a.m4:30 p.m.) Mon. Frl.
	9/221-9600 (4:30 p.m7:30 a.m.) 7 days/week
h. Ohio EPA (Emergency Response)	9/1-800/282-9378 (24 Hrs.)
i. Emergency Management Agency	9-469-9700
of Columbus & Franklin County	462-3333 (Night/Weekend)
,	Pager 30, 31, 32
j. If substance gets in sewer:	90. 00, 0., 0
Calcada Division of Caraca	

Columbus Division of Sewers and Drains

9-645-7016*

k. Other agencies as required

(see pgs. 24, 25 & 26)

*NOTE: The City requires the generator to notify the Surveillance Section Laboratory at 614/645-7016, immediately of any discharge that gets into the sewer system, to enable countermeasures to be taken to minimize damage to the wastewater treatment system and/or the receiving waters. If no one is available to accept the telephone notification, leave a message on the recorder and call 614/645-7102, which is answered twenty-four (24) hours a day, for further notification.

8. In response to a fire, explosion or release, the hazardous waste activity will be ceased.

Hazardous waste activity will resume only after all hazardous waste is containerized and the area is documented to be clean.

SECTION VII - Emergency Equipment

The following list details the emergency equipment used in the event of a Hazardous Waste Emergency. Also included is the location of the equipment with a description of the item and its capabilities. This list will be revised in the event of additions or deletions to the Hazardous Waste Emergency equipment inventory.

Additional information on spill related emergency equipment can be found on page 19.

When the emergency equipment is utilized, it will be decontaminated and renovated prior to the resumption of Hazardous Waste Storage operations.

Water for the sprinkler system is supplied by city water with pressure boosted by a water tower and by boosting pumps. The pressure in the fire line is maintained at 160 psig.

Section 7

ITEM	LOCATION	DESCRIPTION/CAPABILITIES
Sand	Hazardous Waste Storage BuildingEnd of loading dockEnd of Parker Street	Dry sand for the control of spills
Shovel (Brass or Aluminum)	Hazardous Waste Storage Building End of Parker Street	Handling of sand and contaminated solids
Portable Sump Pumps, Hard Pump, Air Pumps	Maintenance storage areaHazardous Waste Storage Building	Movement of spilled liquids from sump to drums
Telephone	In Hazardous Waste Storage Building	Explosion-proof; communication access to Emergency Coordinator and response personnel
Fire Hose	North wall of Building 66 (across Parker St. from storage building)	75 feet of 1 1/2" hose (capable of storage building coverage) 50 gpm discharge capacity
Sprinkler System	Inside Hazardous Waste Storage Building	Exceeds "high hazard protection" (69 ft.² floor space per sprinkler head) 50 gpm discharge capacity

(Continued)

Section 7

ITEM	LOCATION	DESCRIPTION/CAPABILITIES
Fire Extinguisher	Inside Hazardous Waste Storage Building	15 lb. CO ₂ ; Cover AB & C fires A-wood, cloth, paper B-flammable liquids C-electrical
Fire Alarm	 Outside wall of Building 36; approx. 50 ft. from entrance of drum storage building 	Notify Fire Department
Clay	Raw Latex storage areaBuilding 33, 15 on 2nd Floor	Bagged clay for latex spills
Scrap Cloth	• East side of Building 4	Soak up spills
Booms	 Hazardous Waste Storage Building Loading dock (side of Building #85) Stored in 55-Gallon Drums 	Contain the spill
Dry Absorbents	Through-out Plant	Soak up spills
Squeegees	Hazardous Waste Storage Building Through-out Plant	Mix sand/absorbants with spilled material and consolidate residue.

SECTION VIII - On-Site Analytical Capability

The following list details the analytical equipment available to the emergency coordinator in the event of a Hazardous Waste emergency. Also included is the location of the equipment and its capability.

EQUIPMENT	LOCATION	CAPABILITIES
1. Fourier Transform Infrared Spectrometer	Analytical Lab	Raw material and waste analysis.
 a. Perkin Elmer 1760 with FMIR, horizontal ATR accessories and - Circom Quantitative Software - Sprouse Search Libraries 		
2. Gas Chromatography with Laboratory Integrators	Mini Lab	Solvent analyses.
a. Hewlett Packard 5890A dual column FID and TCD detectors. Programmable with computer interface for integration.		
b. Varion 920- Isothermal single column with TCD detector		
c. Nelson Analytical PC with IBM PS/2 Model 50	Activities and the second seco	
d. Spectra Physics System 1 (2)		
3. Electrochemistry	Analytical Lab	Water content of solvents & coatings.
 a. Orion 960 Autochemistry System - Selective ion chloride & silver/sulfide electrode - pH meter - Auto-potentiometric titrations 		
b. Karl Fisher (Fisher Scientific Model 392 K-F)	Analytical Lab	Water analysis of solvents & other solutions.
c. Beckman Zeromatic pH meter	Analytical Lab	pH determination.

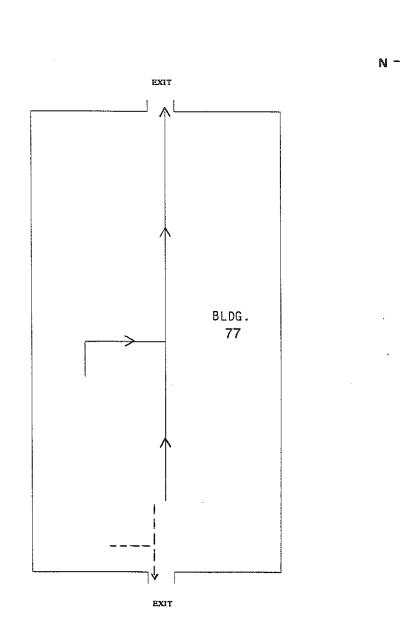
VIII - Columbus Coated Fabrics' On-Site Analytical Capability

EQUIPMENT	LOCATION	CAPABILITIES
4. Viscometry		Viscosity & rheology of solutions.
a. Brookfield RV Viscometer	Analytical Lab	
b. Brookfield Digital LV and Recorder	Lab #6	
c. Constant temperature bath with Ubbelohde type Viscometer	Analytical Lab	
5. Microscopy	Analytical Lab	Identification of materials.
 a. American Optical Model A0580 Stero Microscope with auto exposure 35mm & Polaroid photo capability 		
 b. American Optical Model A0570 Stero Microscope with polarizer 		-
c. Olumpus Polarizing microscope		
6. Refractometer	Analytical Lab	Refractive index determination
Bausch & Lomb Abbe - 3L with constant temperature bath	·	
7. Computrac MAX50 Automated Moisture/Solids Analyzer	Analytical Lab	Moisture & non-volatile matter analyses.

VIII - Columbus Coated Fabrics' On-Site Analytical Capability (Con't.)

SECTION IX - Emergency Evacuation Routes from Various Areas in the Facility

DESIGN CENTER BUILDING #77 FIRST FLOOR EMERGENCY EVACUATION ROUTES



PRIMARY ______ALTERNATE ______

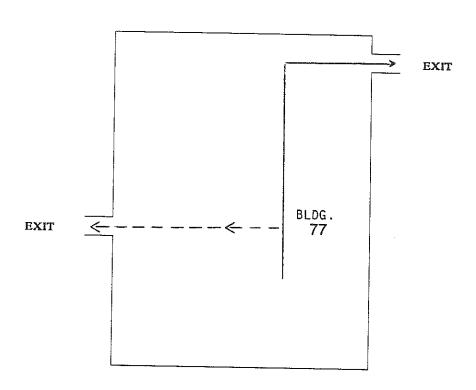
Immediately following evacuation, employees must report to the <u>paved</u> parking lot for attendance by your immediate supervisor.

E

W

DESIGN CENTER BUILDING #77 BASEMENT EMERGENCY EVACUATION ROUTES



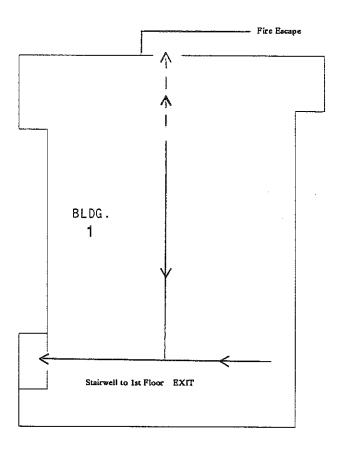


PRIMARY	
ALTERNATE	

Immediately following evacuation, employees must report to the <u>paved</u> parking lot for attendance by your immediate supervisor.

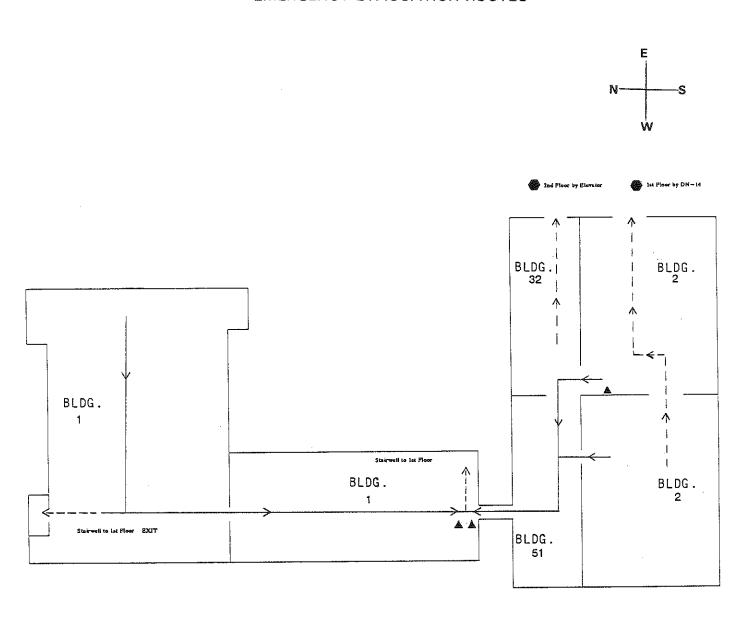
BUILDING #1 OLD MAIN OFFICE THIRD FLOOR EMERGENCY EVACUATION ROUTES





PRIMARY	
ALTERNATE	—————————————————————————————————————

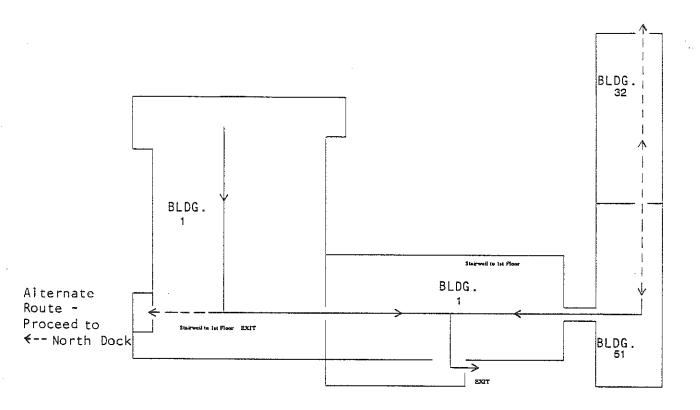
BUILDING #1, 2, 32, 51 OLD MAIN OFFICE SECOND FLOOR EMERGENCY EVACUATION ROUTES





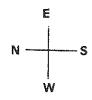
BUILDING #1, 32, 51 OLD MAIN OFFICE FIRST FLOOR EMERGENCY EVACUATION ROUTES

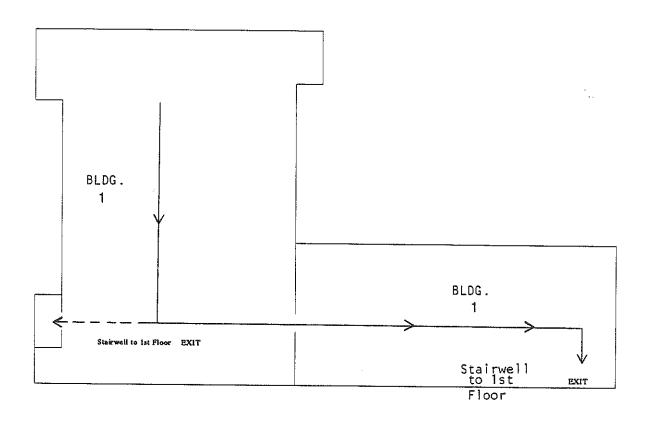




PRIMARY
ALTERNATE ______

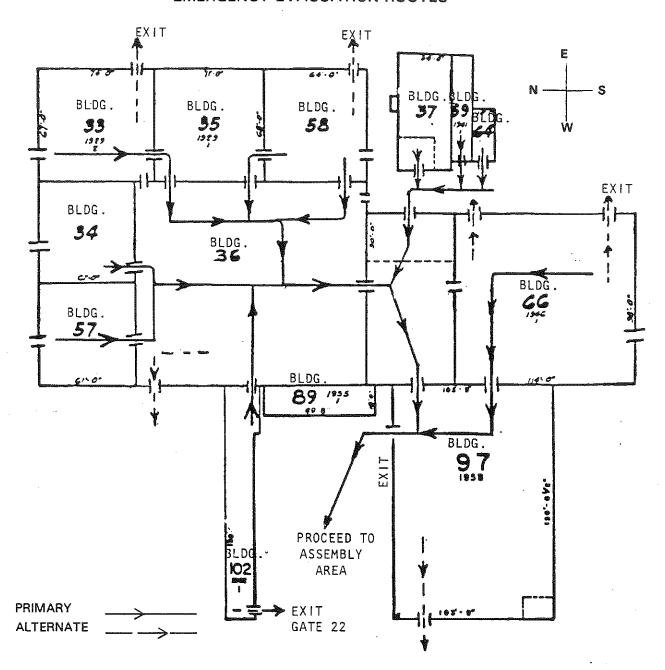
BUILDING #1 OLD MAIN OFFICE BASEMENT EMERGENCY EVACUATION ROUTES





PRIMARY	
ALTERNATE	

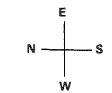
SOUTH COATING, MIXING, HAZARDOUS WASTE STORAGE EMBOSSING & FINAL ASSEMBLY DEPARTMENTS EMERGENCY EVACUATION ROUTES

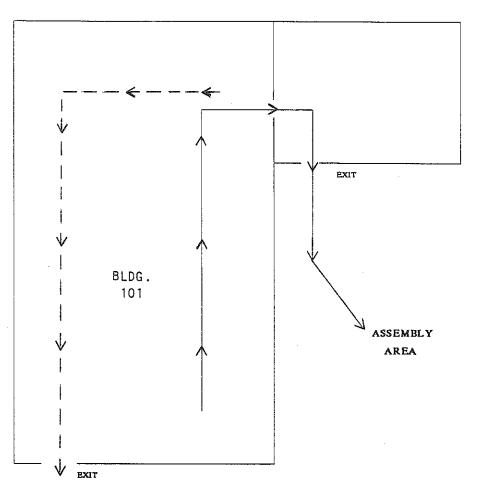


IMMEDIATELY FOLLOWING EMERGENCY EVACUATION:

- South Coating, Mixing, Hazardous Waste Storage, Embossing & Final Assembly Employees must report in front of the Conference Center for attendance by your immediate supervisor.
- Materials Control employees must report to the parking lot across from Gate 22 for attendance by your immediate supervisor.

CHROME PLATING DEPARTMENT EMERGENCY EVACUATION ROUTES

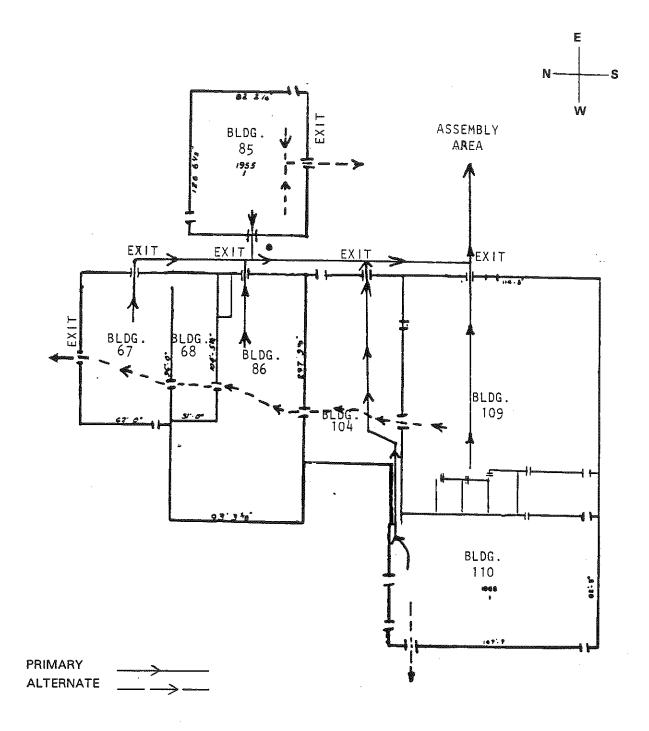




PRIMARY	
ALTERNATE	

Immediately following emergency evacuation, Chrome Plating Department employees must report to the adjacent parking lot north of the Chrome Plate entrance for attendance by your immediate supervisor.

CALENDER & ROLL STACKER DEPARTMENTS EMERGENCY EVACUATION ROUTES

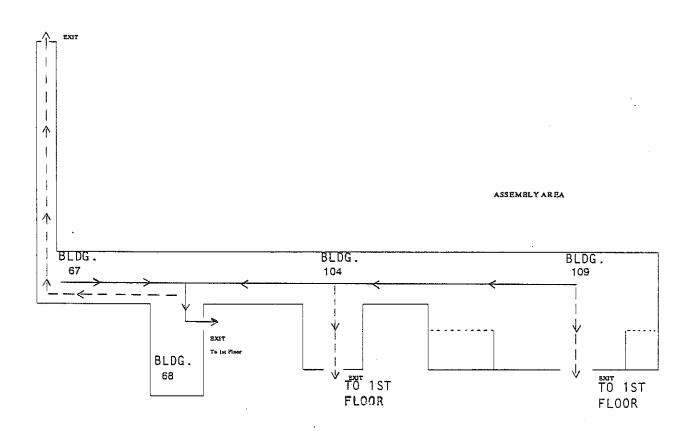


IMMEDIATELY FOLLOWING EMERGENCY EVACUATION:

Calender & Roll Stacker employees must report to Hill East of the Resin Silos for attendance by your immediate supervisor.

CALENDER PRE-MIX DEPARTMENT SECOND FLOOR EMERGENCY EVACUATION ROUTES

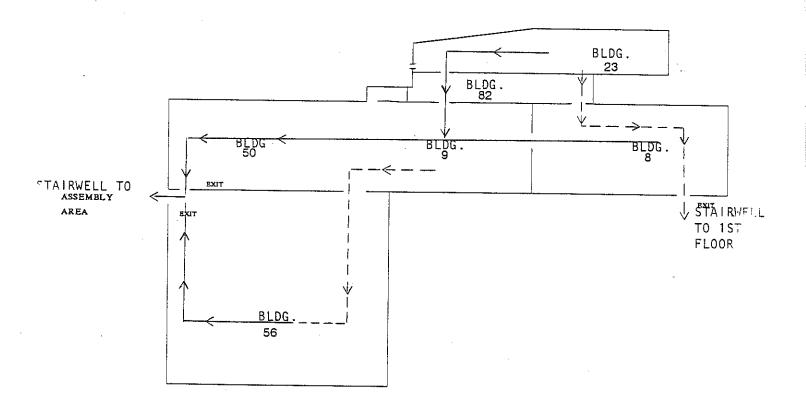




Immediately following emergency evacuation, Calender/Pre-Mix employees must report to the Hill East of the Resin Silos for attendance by your immediate supervisor.

OLD INSPECTION AREA THIRD FLOOR EMERGENCY EVACUATION ROUTES

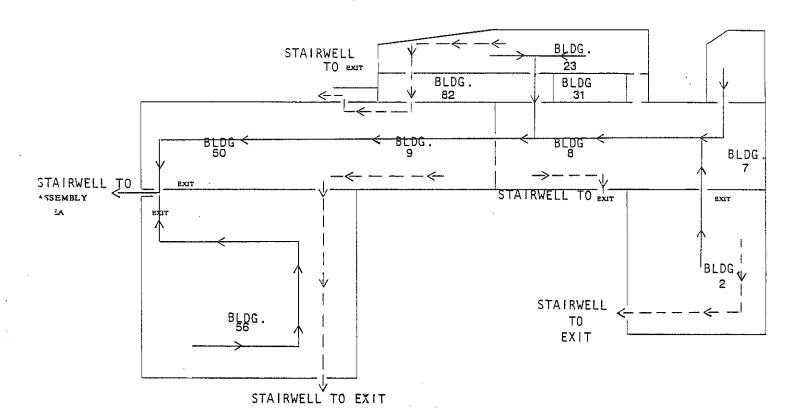




PRIMARY
ALTERNATE

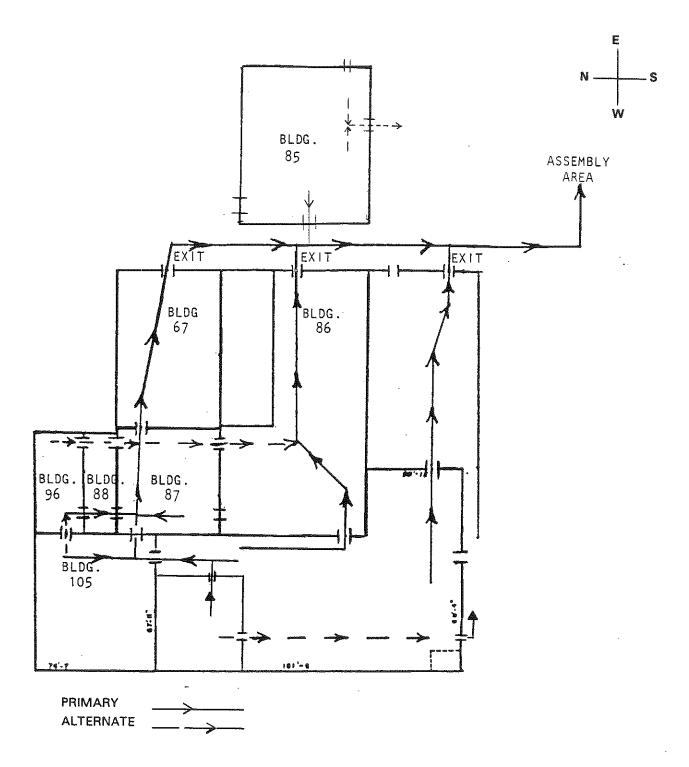
OLD INSPECTION AREA SECOND FLOOR EMERGENCY EVACUATION ROUTES





PRIMARY
ALTERNATE

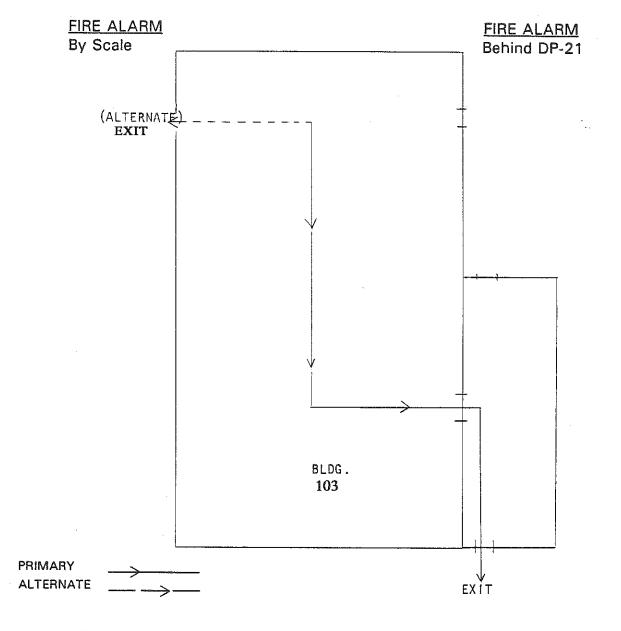
PRINT DEPARTMENT EMERGENCY EVACUATION ROUTES



Immediately following evacuation, Print Department employees must report to the Hill East of Gate 5 for attendance by your immediate supervisor.

LABORATORY FIRST FLOOR EMERGENCY EVACUATION ROUTES

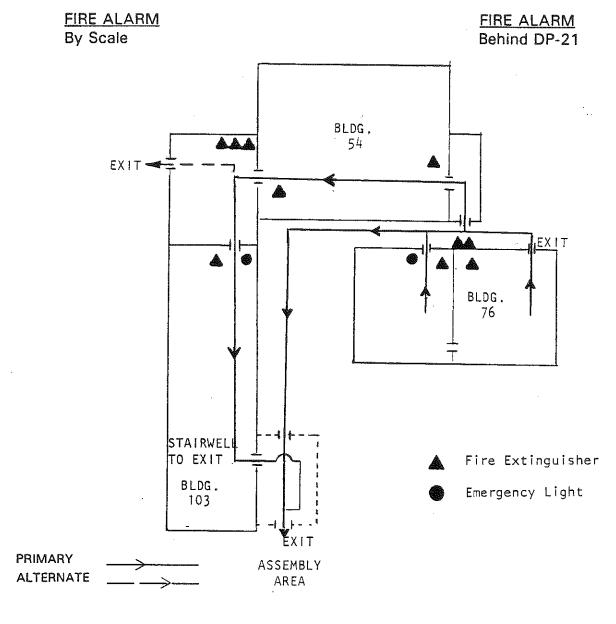




Immediately following evacuation, employees must report to the Parking Lot directly across from Laboratory for attendance by your immediate supervisor.

LABORATORY SECOND FLOOR EMERGENCY EVACUATION ROUTES

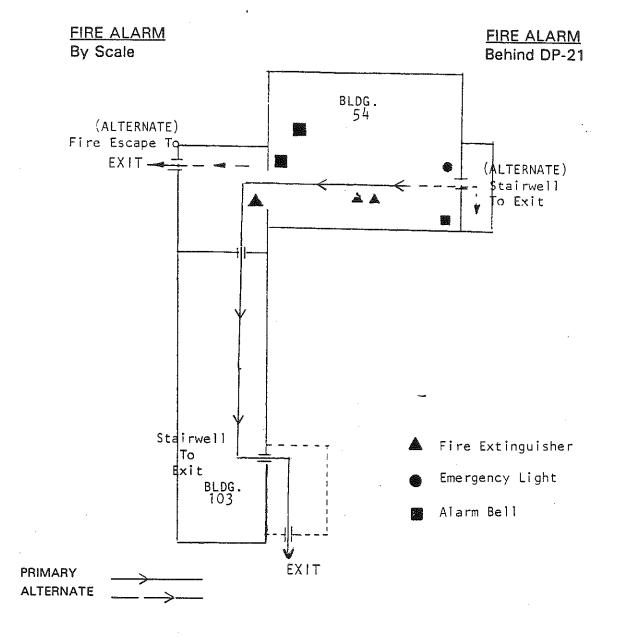




Immediately following evacuation, employees must report to the Parking Lot directly across from Laboratory for attendance by your immediate supervisor.

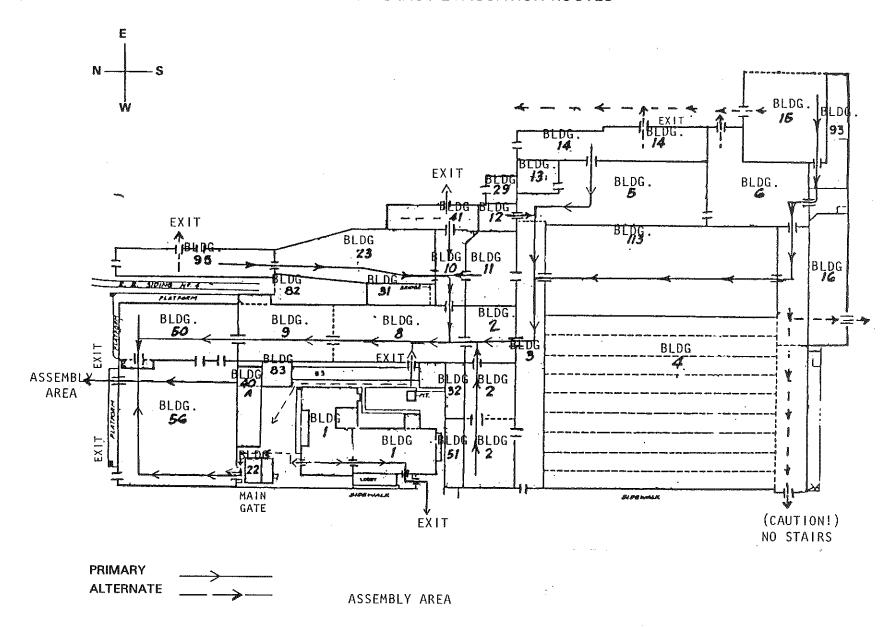
LABORATORY THIRD FLOOR EMERGENCY EVACUATION ROUTES





Immediately following evacuation, employees must report to the Parking Lot directly across from Laboratory for attendance by your immediate supervisor.

ALL BUILDINGS NORTH OF COATING & LAMINATING EMERGENCY EVACUATION ROUTES



SECTION X - Written Report Specifications

Any incident that requires implementation of the contingency plan will be recorded in the operating record as to the time, date and details.

Within 15 days following the incident, a written report will be submitted to the Regional Administrator and the Director, Ohio EPA.

This report will include:

- Name, addresses and telephone numbers as follows:
 - a. Columbus Coated Fabrics (614) 297-6122 1280 North Grant Avenue Columbus, OH 43201
 - b. Borden, Inc. (614) 225-4000 180 E. Broad St. Columbus, OH 43215
- 2. Date, time and type of incident.
- 3. Name and quantity of material(s) involved.
- 4. Extent of injuries, if any.
- 5. An assessment of actual or potential hazards to human health or the environment, if applicable.
- 6. Estimate quantity and disposition of recovered materials resulting from the incident.

CITY NOTIFICATION

The City requires the generator to notify the Surveillance Section Laboratory at 614/645-7016, immediately of any discharge that gets into the sewer system, to enable countermeasures to be taken to minimize damage to the wastewater treatment system and/or the receiving waters. If no one is available to accept the telephone notification, leave a message on the recorder and call 614/645-7102, which is answered twenty four (24) hours a day, for further notification.

The City further requires a written follow-up report, filed by the generator within five (5) calendar days, with the City Surveillance Section. The report shall contain the following:

- 1. A description of the discharge, the cause of the upset and the upset's impact upon the user's compliance status.
- 2. The period of noncompliance, including the exact dates and times of noncompliance, and if the noncompliance continues, the time by which the noncompliance is expected to be corrected.
- 3. Any and all steps taken, or to be taken, to reduce, eliminate and prevent recurrence of the noncompliance.

This written report is to be sent to:

City of Columbus Surveillance Section 900 Dublin Road Columbus, OH 43215

SECTION XI - Letters of Transmittal

In order to familiarize the local fire, police and hospitals on the procedures of the wastes handled and the fire and emergency access routes, the contingency plan has been submitted to these aforementioned agencies. As any updates of the contingency plan are initiated, they will be forwarded to these agencies.

The following letters indicate the submission of SPCC/RCRA contingency and emergency evacuation plans in order to fulfill coordination agreement requirements.

The hazards represented by the wastes handled and the potential exposure to these hazards are of particular value to the agencies receiving the contingency plan.

In the eventuality that outside assistance would be necessary to treat injuries arising from a fire, explosion or toxic or corrosive release, or to respond to the above conditions, Columbus Coated Fabrics has received assurance from the following hospitals and agencies that they have the necessary resources to appropriately support Columbus Coated Fabrics in any such emergency.

Ohio EPA Emergency Response Section

Columbus Fire, Health & Police Departments

Doctor's North, Grant, Riverside and University Hospitals

The following letters dated December 19, 1991 were sent to the above hospitals for verification of these coordination agreements. As verification letters are received from the hospitals they will be included with this section.

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

David Ullrich, Director of Waste Management Division, H-7J U.S. EPA, REGION V 77 West Jackson Street Chicago, IL 60604

Re: SPCC for Columbus Coated Fabrics

Dear David:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

COLUMBUS COATED FABRICS

GT/rap attach.

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Michael Savage, Assistant Chief Inspections & Inforcement Program Ohio EPA 1800 WaterMark Drive P.O. Box 1049 Columbus, OH 43266-0149

Re: SPCC for Columbus Coated Fabrics

Dear Michael:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

COLUMBUS COATED FABRICS

GT/rap attach.

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ken Schultz, Chief Emergency Response Section OEPA 1800 WaterMark Drive P.O. Box 1049 Columbus, OH 43266-0149

Re: SPCC for Columbus Coated Fabrics

Dear Mr. Schultz:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

Trover Thomas

COLUMBUS COATED FABRICS

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Michael J. Pompili, MS, RS Assistant Health Commissioner Environmental Health Division Columbus Health Department 181 Washington Boulevard Columbus, OH 43215-4096

Re: SPCC For Columbus Coated Fabrics

Dear Mr. Pompili:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

Thomas Thomas

COLUMBUS COATED FABRICS

GT/rap

encl.

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

City of Columbus
Division of Sewerage & Drainage
900 Dublin Road
Columbus, OH 43215-1116

Re: SPCC for Columbus Coated Fabrics

Dear Sir or Madam:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

Sprover Thomas

COLUMBUS COATED FABRICS

GT/rap

attach.

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

James Jackson, Police Chief City of Columbus Police Division 120 West Gay Street Columbus, OH 43215

Re: SPCC For Columbus Coated Fabrics

Dear Chief Jackson:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

Those Thomas

COLUMBUS COATED FABRICS

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Harmon J. Dutko, Fire Chief Division of Fire City of Columbus 200 Greenlawn Avenue Columbus, OH 43223

Re: SPCC for Columbus Coated Fabrics

Dear Chief Dutko:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

Frover Thomas

COLUMBUS COATED FABRICS

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Doctors Hospital - North Administration Department 1087 Dennison Avenue Columbus, OH 43201

Re: SPCC for Columbus Coated Fabrics

Dear Sir:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

COLUMBUS COATED FABRICS

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Riverside Hospital Administration Department 3535 Olentangy River Road Columbus, OH 43214

Re:

SPCC for Columbus Coated Fabrics

Dear Sir:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

Grover Thomas

COLUMBUS COATED FABRICS

GT/rap

encl.

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Grant Hospital Administration Department 111 South Grant Avenue Columbus, OH 43215

Re: SPCC for Columbus Coated Fabrics

Dear Sir:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

Shover Thomas

COLUMBUS COATED FABRICS

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

University Hospital Administration Department 450 West 10th Avenue Columbus, OH 43210

Re: SPCC for Columbus Coated Fabrics

Dear Sir:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas,

Environmental Manager

Stewer Thomas

COLUMBUS COATED FABRICS

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Doctors Hospital - North Administration Department 1087 Dennison Avenue Columbus, OH 43201

Re:

SPCC for Columbus Coated Fabrics

Dear Sir or Madam:

The purpose of this letter is to acknowledge receipt of the SPCC/RCRA Contingency Plans from Columbus Coated Fabrics and to describe the arrangements/agreements between Columbus Coated Fabrics and Doctors Hospital - North.

Columbus Coated Fabrics is aware that during any potential fire, explosion or any toxic or corrosive release at our facility there exists the possibility of personal injury beyond our ability to address. In the event of an emergency, Doctors Hospital - North could receive patients from our plant. We have sent to your hospital a copy of Columbus Coated Fabrics' SPCC/RCRA Contingency Plan. As we have in the past, we will continue to submit changes in that plan to you.

As confirmation that you have indeed received and reviewed a copy of Columbus Coated Fabrics' SPCC/RCRA Contingency Plan and that your hospital is equipped and prepared to provide medical support for injuries which might occur from the above emergencies at our facility, we request that you sign this letter in the space below and return a copy to me.

Sincerely,

Shower Thomas
Grover Thomas,
Environmental Manager

COLUMBUS COATED FABRICS

Acknowledged by:

Title:
(For Doctors Hospital-North)

Section 7

Revised December, 1991

Page 74

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Riverside Hospital Administration Department 3535 Olentangy River Road Columbus, OH 43214

Re: SPCC for Columbus Coated Fabrics

Dear Sir or Madam:

The purpose of this letter is to acknowledge receipt of the SPCC/RCRA Contingency Plans from Columbus Coated Fabrics and to describe the arrangements/agreements between Columbus Coated Fabrics and Riverside Methodist Hospital.

Columbus Coated Fabrics is aware that during any potential fire, explosion or any toxic or corrosive release at our facility there exists the possibility of personal injury beyond our ability to address. In the event of an emergency, Riverside Methodist Hospital could receive patients from our plant. We have sent to your hospital a copy of Columbus Coated Fabrics' SPCC/RCRA Contingency Plan. As we have in the past, we will continue to submit changes in that plan to you.

As confirmation that you have indeed received and reviewed a copy of Columbus Coated Fabrics' SPCC/RCRA Contingency Plan and that your hospital is equipped and prepared to provide medical support for injuries which might occur from the above emergencies at our facility, we request that you sign this letter in the space below and return a copy to me.

Sincerely,

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

Frover Thomas

Acknowledged by:

Title:

(For Riverside Methodist Hospital)

Section 7

Revised December, 1991

Page 75

Division of BORDEN CHEMICAL, BORDEN INC.



December 19, 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Grant Hospital
Administration Department
111 South Grant Avenue
Columbus, OH 43215

Re: SPCC for Columbus Coated Fabrics

Dear Sir or Madam:

The purpose of this letter is to acknowledge receipt of the SPCC/RCRA Contingency Plans from Columbus Coated Fabrics and to describe the arrangements/agreements between Columbus Coated Fabrics and Grant Hospital.

Columbus Coated Fabrics is aware that during any potential fire, explosion or any toxic or corrosive release at our facility there exists the possibility of personal injury beyond our ability to address. In the event of an emergency, Grant Hospital could receive patients from our plant. We have sent to your hospital a copy of Columbus Coated Fabrics' SPCC/RCRA Contingency Plan. As we have in the past, we will continue to submit changes in that plan to you.

As confirmation that you have indeed received and reviewed a copy of Columbus Coated Fabrics' SPCC/RCRA Contingency Plan and that your hospital is equipped and prepared to provide medical support for injuries which might occur from the above emergencies at our facility, we request that you sign this letter in the space below and return a copy to me.

Sincerely,

Grover Thomas, Environmental Manager

COLUMBUS COATED FABRICS

Strover Thomas

GT/rap

Acknowledged by:

Title:

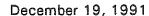
(For Grant Hospital)

Section 7

Revised December, 1991

Page 76

Division of BORDEN CHEMICAL, BORDEN INC.





CERTIFIED MAIL RETURN RECEIPT REQUESTED

University Hospital Administration Department 450 West 10th Avenue Columbus, OH 43210

Re:

SPCC for Columbus Coated Fabrics

Dear Sir or Madam:

The purpose of this letter is to acknowledge receipt of the SPCC/RCRA Contingency Plans from Columbus Coated Fabrics and to describe the arrangements/agreements between Columbus Coated Fabrics and University Hospital.

Columbus Coated Fabrics is aware that during any potential fire, explosion or any toxic or corrosive release at our facility there exists the possibility of personal injury beyond our ability to address. In the event of an emergency, University Hospital could receive patients from our plant. We have sent to your hospital a copy of Columbus Coated Fabrics' SPCC/RCRA Contingency Plan. As we have in the past, we will continue to submit changes in that plan to you.

As confirmation that you have indeed received and reviewed a copy of Columbus Coated Fabrics' SPCC/RCRA Contingency Plan and that your hospital is equipped and prepared to provide medical support for injuries which might occur from the above emergencies at our facility, we request that you sign this letter in the space below and return a copy to me.

Sincerely,

Grover Thomas, Environmental Manager COLUMBUS COATED FABRICS

Grover Thomas

Acknowledged by:

Title:
(For University Hospital)